SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

TUESDAY, APRIL 5, 2005

8:30 A.M.

(PAGES 4899 THROUGH 4960)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 4899

APPEARANCES OF COUNSEL:

For Plaintiff: THOMAS W. SNEDDON, JR.,
District Attorney -and-
RONALD J. ZONEN, Sr. Deputy District Attorney
-and- GORDON AUCHINCLOSS,
Sr. Deputy District Attorney 1112 Santa Barbara Street
Santa Barbara, California 93101

For Defendant: COLLINS, MESEREAU, REDDOCK & YU BY: THOMAS A. MESEREAU, JR., ESQ.
-and- SUSAN C. YU, ESQ.
1875 Century Park East, Suite 700 Los Angeles, California 90067
-and-
SANGER & SWYSEN
BY: ROBERT M. SANGER, ESQ. 233 East Carrillo Street, Suite C
Santa Barbara, California 93101
-and-
OXMAN and JAROSCAK BY: R. BRIAN OXMAN, ESQ.
14126 East Rosecrans Boulevard Santa Fe Springs, California 90670

I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Nicola is listed as “N” on index. Mr. Mesereau is listed as “M” on index.
Ms. Yu is listed as “Y” on index. Mr. Sanger is listed as “SA” on index.
Mr. Oxman is listed as “O” on index.

PLAINTIFF’S
WITNESSES DIRECT CROSS REDIRECT RECROSS
FRANCIA, Jason 4902-M 4944-Z
(Cont’d)
KALLMAN, Kris 4949-SN

Santa Maria, California
Tuesday, April 5, 2005
8:30 a.m.

THE COURT: Good morning.
THE JURY: (In unison) Good morning.
THE COURT: Mr. Mesereau?
MR. MESEREAU: Yes. Thank you, Your Honor.

JASON FRANCIA
Having been previously sworn, resumed the stand and testified further as follows:

CROSS-EXAMINATION (Continued)
BY MR. MESEREAU:
Q. Mr. Francia, we were discussing yesterday your first interview with two police detectives which took place on November 3rd, 1993, okay?
A. Okay.
Q. That's where we left off.
Now, did you discuss your testimony yesterday with anyone after you left the courthouse?
A. Yeah.
Q. Who did you discuss it with?
A. My wife.
Q. Anyone else?
A. No.
Q. Did you discuss it with any prosecutor? 4902

A. No, I was kind of nervous. I said, “How’d it go?” And they smiled and they said, “It went well.”
Q. And which prosecutor told you that?
A. I can’t specifically remember, but it was one of them.
Q. Okay. Did you discuss anything else with one of them?
A. No.
Q. Did you talk with any sheriff about your testimony?
A. No.
Q. Were you on the phone last night with anyone about your testimony?
A. No. I did tell my pastor this morning that I was on the stand, and if he could pray for me. But other than that, that was it.
Q. Anyone else?
A. Nope.
Q. Okay. Now, yesterday you told the jury that Mr. Jackson had given you some money, correct?
A. Right.
Q. And you told them he had given you hundred-dollar bills, right?
A. Right.
Q. Isn’t it true that when you were originally interviewed by the police, you told them that Mr. Jackson would give you money each time you read a 4903

book?
A. Yeah, he also said that, as well. Yeah,
he'd give me $20, I think it was.
Q. And you told the police that you remember
him having a room full of books, and you said every
time you complete a book, he'll pay you some money,
right?
A. I don't remember that, but I remember
listening to it on the tape.
Q. But that was your voice on the tape,
correct?
A. Yes.
Q. Okay. You also told the police that Mr.
Jackson told you one time that if you got A's in
school, he would also pay you every time you got an
A, correct?
A. Yes. That is correct. I remember -- I
don't remember him saying that, but I remember it on
the tape.
Q. And that was your voice on the tape?
A. Yes, sir.
Q. Telling it to the police, correct?
A. Yes, sir.
Q. Okay. When you met with the prosecutors
before you testified, did anyone tell you not to
mention that when you talked about money?
A. No.
Q. Okay. You just forgot? 4904

A. I'm sorry?
Q. You just forgot yesterday?
MR. ZONEN: Objection; argumentative.
THE COURT: Overruled.
You may answer.
Q. BY MR. MESEREAU: When you were responding
the prosecutor's questions --
THE COURT: Wait. He has a question pending.
MR. MESEREAU: Oh, I'm sorry.
THE COURT: I overruled the objection.
THE WITNESS: Can you repeat the question?
THE COURT: The question was, "You just
forgot yesterday?"
THE WITNESS: I have no idea what you're
referring to. I just forgot about what?
Q. BY MR. MESEREAU: About Mr. Jackson paying
you money for, one, reading a book --
A. No --
Q. -- and, two, getting A's.
A. I didn't remember that, but I remember
saying that on the tape.
Q. Okay. Okay. Now, following your interview
with two police officers in November of 1993, to
your knowledge, Mr. Jackson was never charged with a
crime involving anything you said, correct?
A. I don't know.
Q. Okay. Did you ever hear anything about
that? 4905

A. I -- no.
Q. Okay. To this day, you're not sure if Mr.
Jackson was ever charged with any crime involving --
A. I don't know.
Q. -- what you claim happened?
A. No.
Q. Okay. You also were interviewed a second
time.
A. There's a hand being raised behind you guys
over there.
Q. You were interviewed a second time on March
24th, 1994. Do you remember that?
A. Again, I personally don't remember, and I
didn't even really listen to that tape, so -- and I
didn't get a transcript for it either, so I didn't
even review it.
Q. You were given a tape of your second
interview?
A. I was, but I did not listen to it.
Q. And who gave you that tape?
A. It came in the same packet as tape one and
with the transcript.
Q. Do you remember present at that interview
was Tom Sneddon?
A. I remember saying that yesterday, yeah. And
I also remember saying that I was unsure if he was
there or not.
Q. Okay. But you do remember now he was there, 4906

right?
A. I did not say that.
Q. Would it refresh your recollection if I just show you a transcript?
A. Sure.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Is this a transcript of '94?
MR. MESEREAU: (Nods head up and down.)
THE WITNESS: So these are the people that were there? I -- I can't ask that.
THE COURT: He's asking you to look at that and see if that refreshes your memory to see --
THE WITNESS: No, it does not refresh my memory.
Q. BY MR. MESEREAU: So you don't remember if you were interviewed by Tom Sneddon and two district attorneys in '94?
A. I remember Mike Craft being there. That was the only person. And a woman being there. Other than that, I cannot -- because I think that was the first time I told a woman what happened.
Q. Do you remember someone named Lauren Weis from the Los Angeles District Attorney's Office being there --
A. I don't. I'm really bad at names.
Q. I have to complete the question. Thank you.
Do you remember someone named Lauren Weis 4907

from the Los Angeles District Attorney's Office being present at that interview?
A. No.
Q. Do you remember someone named Bill Hodgeman from the Los Angeles District Attorney's Office being at that interview?
A. No.
Q. And you don't remember whether or not Mr. Sneddon was there, right?
A. I -- correct.
Q. Are you saying he wasn't there, or you just don't remember?
A. I don't remember whether he was there or not.
Q. Do you remember Russ Birchim being there?
A. I do not.
Q. Do you remember your own lawyer, Terry Cannon, being there?
A. I do not.
Q. Do you remember stating in that interview, "They made me come out with a lot more stuff I didn't want to say. They kept pushing. I wanted to get up and hit them in the head"? Do you remember that?
A. No.
Q. Would it refresh your recollection if I show you the transcript of that?
A. Probably not. But you can show it to me 4908

anyway.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
MR. ZONEN: What page, Counsel?
MR. MESEREAU: 30.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to look at that page of the transcript?
A. I have.
Q. Does it refresh your recollection about what you've said?
A. No, it does not.
Q. Do you remember anything you said in that interview at the moment?
A. Not really.
Q. Okay. All right. Do you remember in that interview telling the people who were present that at one point a woman came into a room where you and Michael were present?
A. No, I do not.
Q. Do you remember seeing Janet Jackson on one occasion?
A. I remember saying that, or do I remember seeing her?
Q. Do you remember seeing her?
A. I think I did meet her once.
Q. Do you remember where you met her?
A. I think it was at the mansion in Encino. 4909

Q. Okay.
A. But I really -- like, I think that's where it was.
Q. Okay. Do you remember telling the sheriffs that the first time you were tickled by Mr. Jackson you think it lasted about 30 seconds?
A. Are we talking the first interview, second interview?
Q. Either one.
A. I do not remember.
Q. Okay. You do remember giving more information the second time, correct?
MR. ZONEN: "Second time?" Objection; vague.
MR. MESEREAU: Excuse me. He's correct. I'll withdraw it.
Q. You do recall giving more information during your second interview than you did in your first, right?
A. I do not recall.
Q. Okay. How did you meet Attorney Terry Cannon?
A. I can't -- I think I met them at Mike Craft's office.
Q. Excuse me, at whose office?
A. Mike Craft's, my counselor.
Q. Okay. And does Terry Cannon still represent you? 4910

A. I don't think so, no.
Q. Well, you gave an interview with Mr. Zonen in December of 2004, correct?
A. Yes. That was the first time I think I met them.
Q. And Terry Cannon was present, correct?
A. You're right.
Q. And Terry Cannon at that time was working for the District Attorney's Office in San Diego, correct?
A. Correct.
Q. But he still came up to act like your lawyer, didn't he?
MR. ZONEN: I'll object to the expression, "act like your lawyer"; vague. Or argumentative.
THE COURT: Well, I guess instead of "like," it might be "as."
MR. MESEREAU: I'll rephrase it, Your Honor.
Q. Mr. Cannon was present at your interview with Ron Zonen on December 6th, 2004, right?
A. Yes, sir.
Q. At that interview, he was serving as your lawyer, correct?
A. I don't know.
Q. Do you know why he was there?
A. I didn't really know. I was asked by -- actually, I didn't even know how I met you guys. I was asked to be there, I think, and he was there. 4911

Q. Okay. Did he give you any legal advice before that meeting?
A. Actually, he said, “You don’t have to answer things if you don’t want to,” but I think that was just a -- man advice.
Q. So he was giving legal advice?
A. I don’t know if that’s legal advice or not.
Q. Did he discuss with you what you were going to say in that interview?
A. No.
Q. Do you remember when that interview began, you requested that your interview not be tape-recorded?
A. I don’t remember that.
Q. Would it refresh your recollection if I show you a report on that interview?
A. Okay. Sure.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to look at that report?
A. I read the first paragraph.
Q. And does it refresh your recollection that you requested that your interview not be tape-recorded?
A. It does not, but I probably said that.
Q. Okay. You don’t know for sure, though? 4912

A. No.
Q. Okay. And you had requested that Mr. Cannon be present at the interview, right?
A. You're going to have to show me the paper probably.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: (Nods head up and down.)
Q. BY MR. MESEREAU: Have you had a chance to look at the report?
A. I did.
Q. Does it refresh your recollection that you wanted Mr. Cannon present?
A. It does not refresh my recollection.
Q. Let me just try and get this straight. You don't know why Mr. Cannon was there, correct?
A. Correct.
Q. You didn't ask him to be there, right?
A. I don't remember whether I asked for him to be there or not. I probably did, only because he was a friend of mine and he knows more legal stuff than I do.
Q. Okay. Did you know he was working for a District Attorney's Office at the time?
A. I believe I did, because we kept in touch --
Q. Okay.
A. -- after I was 18.
Q. All right. Now, Mr. Zonen began that 4913

1 interview by telling you about the current case
2 involving Mr. Jackson, right?
3 A. I didn't understand the question.
4 Q. Well, let me try and rephrase it.
5 A. Okay.
6 Q. At the beginning of that interview, Mr.
7 Zonen gave you his summary of the current case
8 against Mr. Jackson, right?
9 A. I believe so.
10 Q. And he told you about a family named
11 "Arvizo," right?
12 A. Really bad at names. If that's -- he told
13 me about a child molestation.
14 Q. Okay. That these were the charges against
15 Mr. Jackson, right?
16 A. I believe so.
17 Q. Okay. Have you ever met Janet Arvizo?
18 A. I don't know who that is.
19 Q. Ever met David Arvizo?
20 A. I don't know who that is.
21 Q. Ever met Gavin Arvizo?
22 A. Oh, that -- I do know who that is. No, I
23 have not met him.
24 Q. Have you ever met Star Arvizo?
25 A. I have never met an Arvizo I don't think.
26 Q. Never met Davellin Arvizo, correct?
27 A. Right.
28 Q. Have you ever talked to any of the Arvizo 4914

family on the telephone?
A. No.
Q. Okay. But Mr. Zonen was telling you about the Arvizo family, was he not?
A. If that's the child's parents, then yes.
Q. Incidentally, after your second interview, which you don't remember a lot about, to your knowledge, no criminal charges were ever filed against Mr. Jackson involving anything you had told anybody, right?
A. I don't know.
Q. You still don't know?
A. I -- are you talking about '94, the '94 interview?
Q. Yes.
A. Okay. And you're asking if there was criminal charges pressed against Michael?
Q. I'm asking you what you know, okay? You've already indicated that after your '93 interview, no criminal charges were ever filed against Mr. Jackson involving anything you said, right?
A. I don't know much. I don't watch the news.
Q. And -- okay. And after your '94 interview, again, no criminal charges were ever filed against Mr. Jackson involving anything you said, right?
A. I don't know.
Q. Okay. But at your '94 interview, you do remember Terry Cannon being present, right? 4915

A. I don't know. I don't know who was present other than Michael Craft in '94.
Q. Okay. To your knowledge, was it your mom's idea for you to have an attorney at that meeting?
A. To my knowledge, I don't know.
Q. Okay. And again, just for the record, how old were you --
MR. ZONEN: I'll object as vague as to which meeting.
MR. MESEREAU: He's correct. I'll withdraw it.
THE COURT: All right.
Q. BY MR. MESEREAU: To your knowledge, was it your mother's idea to have an attorney be present at the March 24th, 1994, interview?
A. To my knowledge, I have no clue.
Q. Okay.
A. When I was 13, I was really protected by my mom, so I didn't know much --
Q. Okay.
A. -- about anything.
Q. And certainly when you were 13, you didn't hire an attorney, someone else did, right?
A. I didn't -- probably.
Q. Okay. Okay. Do you remember meeting with Attorney Terry Cannon, with your mother, in 1994?
A. I do not remember, but I'm sure we did.
Q. Okay. All right. Do you remember meeting 4916

with any other attorneys that your mother had
retained in 1994?
A. Other than Terry Cannon?
Q. Yes.
A. I don't remember. But there was another
attorney, which is Kris Kallman.
Q. Okay. And Kris Kallman is the attorney who
represented you in a settlement with Mr. Jackson,
right?
A. I don't know whether it was Kris or Terry.
Q. And Kris also represented your mother, who
wanted a settlement with Mr. Jackson, correct?
A. I don't know.
Q. Now, do you know whether or not your mother
went to these attorneys after she learned that Mr.
Jackson had settled with someone named Chandler?
A. I do not.
MR. ZONEN: Objection; lack of foundation.
THE COURT: Court reporter, was that an
answer on there?
THE REPORTER: Yes.
THE COURT: I'll overrule the objection. The
answer was, "I do not."
Q. BY MR. MESEREAU: Why didn't you want your
interview in December of 2004 with the prosecutors
tape-recorded?
A. I don't know.
Q. You don't have any idea why you made that 4917

request?
A. Tape-recording is weird. I don't know. No, I don't.
Q. Okay. Do you remember telling Prosecutor Zonen in the December 2004 interview regarding the first incident you described - okay? - that you and Mr. Jackson were in a tickle contest? Do you remember that?
A. I do not. I don't know whether it was the first interview or the second interview that we talked about Michael molesting me.
Q. Well, actually, in the December interview, you told Prosecutor Zonen that, in all three instances that you described where you claim you were inappropriately touched, every incident was preceded by a tickling contest between you and Mr. Jackson, right?
A. I don't know.
Q. Would it refresh your recollection just to show you the report?
A. You can show it to me, but I don't know whether it was the first or the second.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to review that page of the report?
A. I didn't read the whole page. I read that 4918

1 paragraph.
2 Q. Does it refresh your recollection about what
3 you told Prosecutor Zonen in that December 6th,
4 2004, interview?
5 A. It doesn't -- I don't -- it doesn't help
6 remembering, but --
7 Q. Well, you told him that all three events
8 that you described were preceded by a tickling
9 contest, correct?
10 A. I don't remember.
11 Q. You and Mr. Jackson were in a contest as to
12 who could tickle the most, correct?
13 A. I just said I don't remember that. I don't
14 mean to sound like I'm wasting your time, but this
15 is kind of hard being up here, and --
16 Q. No, please don't. Just respond to my
17 questions, if you would, please.
18 A. Okay. Sorry.
19 Q. Now, on November 19th, 2004, Prosecutor
20 Zonen and Auchincloss interviewed your mother at the
21 District Attorney's Office, right?
22 A. I don't know. Me and my mother don't talk
23 about that stuff much.
24 Q. Well, you were present, weren't you?
25 A. Now I remember, yes.
26 Q. Now you remember?
27 A. Yeah. I was present there.
28 Q. You not only were present, but you also 4919

1 requested that that not be tape-recorded, correct?
2 A. Probably.
3 Q. You don't know?
4 A. I don't know.
5 Q. Would it refresh your recollection to look
6 at that report?
7 A. No. But bring it on up.
8 MR. MESEREAU: May I approach, Your Honor?
9 THE COURT: No, he said it wouldn't.
10 Q. BY MR. MESEREAU: You're not willing to look
11 at it?
12 A. It's not about me willing. I'm willing to
13 look at it, but it's not going to help.
14 Q. Well, that was last November you had that
15 interview with your mom and these prosecutors,
16 correct?
17 A. Again, this is all difficult.
18 Q. I know it's difficult, but you're saying you
19 don't remember that interview?
20 A. You just said I met with my mom and I was
21 there, and I didn't remember until you said that,
22 and then I remembered.
23 Q. Do you remember you and your mom both
24 requested that the interview not be tape-recorded?
25 A. I do not.
26 Q. Would it refresh your recollection to see
27 what it says in the report about that?
28 A. Bring it over. It -- yeah. Bring it over. 4920

MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
Q. BY MR. MESEREAU: Have you had a chance to look at the page of that report?
A. Yeah, I read the first paragraph.
Q. Does it refresh your recollection about you and your mother both requesting no tape-recording?
A. No, it does not.
Q. Okay. You don't remember one way or the other about that?
A. Right.
Q. Okay. Okay. Now, on that particular day, and I'm referring to November 19th, 2004, you were interviewed as well, correct?
A. Was this when my mother was present?
Q. Yes.
A. Okay.
Q. Do you remember you were interviewed on that day?
A. I think I was just there for my mom.
Q. Well, actually, they interviewed your mom first and then they interviewed you second, correct?
A. I don't remember that.
Q. Okay. They interviewed you for about an hour, didn't they?
A. They may have.
Q. Would it refresh your recollection if I show you the report about that? 4921

A. No.
Q. You're not willing to look at it?
A. I'll look at it. I'll look at it, but no,
it probably won't.
Q. You don't remember an hour interview on
November 19th, 2004?
A. Again, the issue is it's all kind of
blending in together.
Q. You do remember the December interview with
Prosecutor Zonen, right?
A. You asked me that --
Q. Yes.
A. Go ahead, ask it again. Do I remember the
December interview?
Q. Yes.
A. I remember it taking place. I don't
remember what specific was asked.
Q. Actually, let me clarify the date.
A. Okay.
Q. Okay. I'm talking about the report. You
were interviewed on October 18th, 2004, by
prosecutors, right?
A. I'm sorry?
Q. You were interviewed on October 18th by
prosecutors, correct?
A. Of 2004?
Q. Yes.
A. I believe that was the first time that I met 4922

1 these guys, but I don't know.
2 Q. And then you were interviewed approximately
3 a month later on November 19th, right?
4 A. You got a bunch of hands raised behind you.
5 THE BAILIFF: Mr. Mesereau, could you check
6 if it's on? I guess they can't hear you back there.
7 THE WITNESS: Sorry, that's what was kind of
8 distracting me.
9 Q. BY MR. MESEREAU: I had mentioned a December
10 date. Actually, you were interviewed in October and
11 November of 2004, right?
12 A. October, November, December. I don't know.
13 Q. Okay. Do you remember having Terry
14 Cannon --
15 A. They're raising their hands again.
16 THE COURT: Quit hitting my microphone.
17 MR. MESEREAU: Oh. Okay.
18 THE COURT: Beat the poor thing -- you know,
19 what's happening, you have a book that's hitting the
20 "off" button. I can see from here that you can't
21 see, maybe.
22 MR. MESEREAU: I think it's on, but --
23 THE COURT: Gently.
24 THE WITNESS: Yeah, it's bad to hit mikes.
25 THE BAILIFF: Actually, it's -- when you
26 step back and are at a far distance, it's hard to
27 hear.
28 MR. MESEREAU: Okay. 4923

Q. In your interview with the prosecutors on
October 18th --
A. This is the first one?
Q. Well, first we have ‘93. Then we have ‘94.
A. Okay.
Q. Then we have October of 2004, and then
November of 2004. Okay?
A. Okay.
Q. In your interview in October of 2004, you
were asked about the third incident where you claim
Mr. Jackson tickled your testicles, right?
A. I was probably asked that, yes.
Q. Do you remember you told the prosecutors it
lasted for more than ten seconds, but you don’t know
how much longer after that?
A. I don’t remember saying that.
Q. Would it refresh your recollection if I
showed you your report?
A. My report? No, it wouldn’t.
Q. Well, the police reports.
A. The police report. I’ll look at it, but
it’s probably not going to help.
Q. Are you willing to give it a chance?
A. Yeah.
Q. Think it might help?
A. No. I’m sorry. But you can -- I’ll give it
a shot.
MR. MESEREAU: Okay. May I approach, Your 4924

Honor?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to look at the page of that report?
A. I have.
Q. Does it refresh your recollection that you told the prosecutors it lasted more than ten seconds?
A. It does not help me remember.
Q. Don't remember that at all?
A. No, but I could probably agree with it if it was in the report.
Q. Okay. Before either the October interview or the November interview with prosecutors, did you discuss what you were going to say in any of those interviews with your mother?
A. No.
Q. You would agree that Attorney Terry Cannon was present at both the October interview, 2004, and the November interview, 2004, right?
A. I can't remember whether he was there on the November one with me and my mom.
Q. Did you discuss what you were going to say at either interview in advance with Attorney Terry Cannon?
A. I don't think so.
Q. How did he end up showing up for any of 4925

those interviews, if you know?
A. I think he called me and said I might be subpoenaed for this. I can't -- I think Kris called me and said I might be subpoenaed up here.
Q. Correct me if I'm wrong, I think you said yesterday that you never knew that your mother had gotten $20,000 from the television show Hard Copy to give an interview.
A. I think you're wrong.
Q. Okay. Did you know that before you testified yesterday?
A. Yes.
Q. And when did you first learn that your mother got $20,000 to give an interview with Hard Copy in the early '90s?
A. I think it was last Sunday.
Q. Okay. And I guess she told you that?
A. No.
Q. She's never told you that?
A. That she received $20,000? She has never told me that.
Q. Did you know before last week that your mother had been paid to go on the television show Hard Copy?
A. I think I assumed it.
Q. Okay. But you didn't know for sure?
A. I didn't know for sure.
Q. Never discussed it with her? 4926

A. I don't think I did, no.
Q. Okay. All right. Now, you admitted that at the beginning of your first interview with sheriffs in '93, you said that Mr. Jackson had not touched your genital area, right?
A. I said that at the very beginning.
MR. ZONEN: Objection; asked and answered.
THE COURT: Sustained.
Q. BY MR. MESEREAU: It was only after you were pushed real hard by the sheriffs that you began to say anything like that, true?
MR. ZONEN: Objection; asked and answered.
THE COURT: Sustained.
Q. BY MR. MESEREAU: And at one point a sheriff actually used a curse word to get you to say something, correct?
A. I don't remember that, but you could show me the thing.
Q. Okay. But as you sit here today, you don't remember, right?
A. I don't remember the four-letter word. Everybody in junior high cussed.
Q. How about the word "bullshit"?
A. What about it?
Q. Do you remember a sheriff telling you that?
A. I don't, but I think I remember listening to it on the tape.
Q. Do you remember in that interview one 4927

sheriff telling you, “Mr. Jackson is a molester,”
and the other saying, “He makes great music, he’s a
great guy, bullshit”? Do you remember that?
A. I don’t remember that specifically, but I
think I remember hearing it on the tape, which was
my voice, or his voice.
Q. You do remember a sheriff’s voice saying
that, right?
A. I don’t remember right now of ‘93, but I
remember listening to the tape.
Q. Okay. And a sheriff said that to you,
correct?
A. I believe so.
Q. And the sheriffs complained that, “Mr.
Jackson has a lot of money” in that interview,
right?
A. I believe he did say that, but can I look at
the paper?
Q. Sure.
May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to
look at the transcript?
A. I did.
Q. Does it refresh your recollection about what
the sheriffs said to you about Mr. Jackson in the
interview? 4928

A. I don't remember that specifically, but reading it in the transcript, I remember reading that in the transcript when I read it on Sunday, when I reviewed the tape.
Q. And even after sheriffs said to you, "He's a molester, he's a great guy, makes great music, bullshit, he has lots of money," you still said he had never touched your genital area, right?
A. I believe so. Probably towards the beginning again.
Q. Do you remember the sheriff interviewing you wanted to know whether Mr. Jackson went under your pants or on top of your underwear, and you said, "I don't know"?
A. I'm sorry?
Q. Do you remember the interviewing sheriff asked you, "Have you ever been touched under your pants or on top of your underwear?" And you said, "I don't know"?
A. Were we talking about a specific incident?
Q. I'm just asking about the interview.
A. Oh. Then --
MR. ZONEN: I'll object as vague, Your Honor.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you remember in that interview, when you first said in response to the sheriffs questions, "Mr. Jackson touched me," you 4929

had no idea how long he had ever touched you?
MR. ZONEN: Objection; vague. Which
incident?
Q. BY MR. MESEREAU: During any incident?
THE COURT: Do you want to rephrase the whole
question?
MR. MESEREAU: Sure.
Q. Do you remember in your first interview with
the sheriffs when, after repeated questioning, you
finally said, “Mr. Jackson touched me,” do you
remember not knowing how long he had ever touched
you at any time?
A. I don’t remember.
Q. Okay. Do you remember telling the sheriffs
that Mr. Jackson, during your tickle games, used to
pinch you in the stomach?
A. Tickling, pinching. Same thing.
Q. Okay. You did tell the sheriffs in your
first interview you had never spent the night with
Mr. Jackson, right?
A. I never slept in his bed with him.
Q. Okay. When did you last talk to Attorney
Terry Cannon?
A. Yesterday.
Q. Did you talk about your testimony?
A. No.
Q. Did you talk about the case?
A. Nope. 4930

Q. Did he call you --
A. Wait, actually, I'm sorry, I didn't talk about the case, but I talked about I was being nervous up here.
Q. Did you call him or did he call you?
A. He called me.
Q. When did you last talk to Attorney Terry Cannon before yesterday?
A. Um -- um, um, um, um. I really cannot remember the specific date.
Q. Now, in your interview of March 24th, 1994, you didn't remember what cartoons you were watching when you claim you were improperly touched, right?
A. I don't know.
Q. Did you know you were being tape-recorded in that interview?
A. You know what? I don't know. Typically I'd remember that.
Q. And do you remember telling the interviewers that Michael Jackson tickled you in your stomach?
A. No.
Q. You don't remember that?
A. No. Can I review that?
Q. Sure.
A. Is that -- it was being taped then? Or you can't say. Okay, yeah.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes. 4931

MR. ZONEN: What page, Counsel?
MR. MESEREAU: 58.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: You remember telling the people interviewing you that Mr. Jackson did tickle you in your stomach, right?
A. I do not remember saying that, but I probably said that.
Q. Okay. Do you remember in that interview when you finally said Mr. Jackson had touched your penis, that you told the interviewers, “He tickled me there”? Right?
A. I don’t know.
Q. Do you remember you were asked, “What did he do with his hands?” And you said, “He tickled me.” Do you remember that?
A. “What did he do with his hands?” And I said, “He tickled me”?
Q. Yes.
A. That’s kind of vague. Like overall he tickled me, or what are you talking about?
Q. You were asked what Mr. Jackson did with your penis. Do you remember that? And you said, “He tickled me.” Do you remember that?
A. He did tickle me.
Q. Okay. You were asked to describe what Mr. Jackson did with his hands, and your response was, “He tickled me,” true? 4932

A. I don’t know. I was probably crying then.
Q. Would you like to review the transcript, see if it refreshes your recollection?
A. Sure.
MR. MESEREAU: Okay. May I approach, Your Honor?
THE COURT: Yes.
Q. BY MR. MESEREAU: By the way, if you don’t remember the interview, how do you know you were crying?
A. Because I usually cry when we’re talking about the molestation.
Q. Okay. Okay. Again, do you remember saying to the police officers in response to their question, “What did he do with your penis?” You said, “He tickled me”?
A. I thought you were going to bring me that thing.
Q. Would you like to see it?
A. Yes.
Q. Okay.
A. Okay.
Q. Do you remember describing what Mr. Jackson did as tickling?
A. Do I remember describing what Michael Jackson did as tickling?
Q. Yes.
A. Like tickling my penis or -- 4933

Q. Yes.
A. Are we talking the first or second or third incident?
Q. I don't know.
MR. ZONEN: Well, I'm going to object as vague.
THE COURT: The objection is sustained.
Q. BY MR. MESEREAU: Do you remember telling the interviewers in that second interview in 1994, when they asked you what Mr. Jackson did with your penis, you said, "He didn't really touch it, he was above my shorts"? Do you remember that?
A. Are we talking first or second or third?
Q. I believe you were just answering their questions.
MR. ZONEN: Objection; vague.
THE COURT: Sustained.
Counsel, you're going to have to direct -- if you're going to question in this manner, you're going to have to direct it to specific times. There were three interviews.
MR. MESEREAU: Okay. I'm sorry, Your Honor.
THE COURT: And you're being unfair to the witness in my opinion.
Q. BY MR. MESEREAU: Okay. Directing you to the second interview that you ever gave about these events, okay? And that was the interview --
A. In '94? 4934

Q. Yes.
A. Okay.
Q. Yes. Okay?
A. I thought we were talking about 2004. I'm
sorry.
Q. Okay. That's my mistake, I apologize.
Let's talk about the 1994 interview.
A. Okay.
Q. All right? Do you remember being asked the
question, "Did Mr. Jackson touch your penis?" And
you said, "He didn't really touch it, he was above
my shorts"?
A. I do not --
THE COURT: Wait. Just a minute.
THE WITNESS: I'm sorry.
THE COURT: I want you to approach.
MR. MESEREAU: Sure.
(Discussion held off the record at sidebar.)
THE COURT: All right. You may proceed.
Q. BY MR. MESEREAU: Okay. I'm going to try
and direct my questions to a particular interview,
one of the four that you had, and direct them to one
of the three events that you have described when you
claim Mr. Jackson improperly touched you, okay?
Now, directing your attention to the second
interview, which is in 1994 - okay? - and directing
your attention to the first event that you have
described where you claim Mr. Jackson improperly 4935

touched you - okay? - do you remember -- excuse me.
Isn't it true that, when asked about the first event
in that second interview, you said Mr. Jackson
didn't really touch your penis?
A. I don't --
MR. ZONEN: What page?
MR. MESEREAU: 60.
THE WITNESS: No, I don't remember.
Q. BY MR. MESEREAU: Would it refresh your
recollection if I show you a page of that
transcript?
A. Bring it over.
MR. MESEREAU: May I approach?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to
look at that page?
A. I have. Well, not the tape. I've read
those two little sentences there.
Q. Does it refresh your recollection of what
you told the people who were interviewing you about
that first event during the interview in 1994?
A. It does not refresh my memory. But in
reading it --
THE COURT: Wait. That's the end of your
answer.
THE WITNESS: Okay. Sorry.
THE COURT: Listen to the question and just 4936

answer the question asked.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: You just don't recall
saying that, right?
A. Correct.
Q. Could you please describe, to the extent you
remember, the sleeping bag in the apartment that you
called the hideout?
A. Describe the bag itself?
Q. Yes. If you remember. How big it was,
where it was, et cetera.
A. Near a window. If you're looking at the
T.V., to the right of the T.V.
Q. And there was no furniture in the apartment
that you remember?
A. I did not say that.
Q. Okay. What did you say?
A. I said that there was an L-shaped couch in
the hideout somewhere, in the living room, I
believe.
Q. Okay. And at any time when you claim you
were improperly touched, were you sitting on the
couch?
A. No, I never said that either.
Q. During the events that you've described at
the hideout --
A. Okay.
Q. -- where you say you were improperly 4937

1 tickled - okay? --
2 A. Okay.
3 Q. -- were you always on top of the sleeping
4 bag?
5 A. No. The first time I was on a chair.
6 Q. Okay. The second time you were on a
7 sleeping bag, right?
8 A. Correct.
9 Q. Okay. Did both of those instances start out
10 as tickle contests?
11 A. Yeah.
12 Q. Okay. And in both of those incidences that
13 you've described, you recall it starting out as
14 innocent sort of tickling and leading to an improper
15 touching, right?
16 A. Right.
17 Q. Okay. Now, you've admitted that Mr. Jackson
18 said he would pay you money for completing a book
19 and also for getting A's in school, right?
20 A. I remember hearing that on the tape.
21 Q. Do you recall Mr. Jackson saying that to
22 you?
23 MR. ZONEN: Objection; asked and answered.
24 THE COURT: Sustained.
25 Q. BY MR. MESEREAU: Do you recall being paid
26 for reading a book?
27 A. I wasn't a reader.
28 Q. Did you ever tell Mr. Jackson, if you 4938

1 remember, “I’ve completed a book”?
2 A. If I did, I don’t know.
3 Q. Okay. Do you remember telling Mr. Jackson
4 you got A’s in school?
5 A. If I did get an A, it was probably in P.E.
6 Q. And do you remember telling that to Mr.
7 Jackson?
8 A. I don’t think I ever did. I don’t know.
9 Q. Okay. Now, without going into any amounts,
10 when did you ever receive any money?
11 A. From Michael?
12 Q. From a settlement --
13 A. Oh.
14 Q. -- in your case.
15 A. From the settlement?
16 Q. Without going into any amounts, just when
17 did you first receive any money?
18 A. When I turned 18.
19 Q. Okay. Without going into any amounts, do
20 you know if your mother has received any money from
21 Mr. Jackson?
22 A. She has.
23 Q. Do you know approximately when she received
24 money from a settlement?
25 A. I don’t.
26 Q. Okay. Do you know if it was before you did?
27 A. I think it was.
28 Q. Okay. Have you ever been approached by 4939

anyone in the media who wanted to talk to you about anything involving Mr. Jackson?
A. Yes.
Q. And when did that happen?
A. Geez. When I was in junior high; when I was -- shoot, in ‘93 -- in ‘93, ‘94 I think. Recently. Well, actually, not recently. A couple years ago. They -- yeah, the media.
Q. Do you know how the media ever heard about you?
A. I don’t.
Q. Okay.
A. Actually, I talked to a media guy once.
Q. Who was that?
A. I don’t remember. He had a British accent. But I did not say anything about the case, or anything about Michael. What --
Q. And when did this happen?
MR. ZONEN: I’m not sure the witness had completed his answer.
MR. MESEREAU: Oh, I’m sorry, I thought he had.
Q. BY MR. MESEREAU: Were you finished?
A. No, I wasn’t.
Q. My mistake.
THE COURT: Let’s just stop. There wasn’t any question pending. He was in a narrative for some reason. Next question. 4940

THE WITNESS: Okay.
Q. BY MR. MESEREAU: Do you know approximately when you spoke to a representative of the media?
A. I don't. I know I was late to class, but I don't. I was in -- probably '92 or '93.
Q. How about in recent -- the last couple years, anyone approach you, to your knowledge?
A. Well, to my knowledge, no. They tried to, but I somehow always evade them. Not on purpose. It just happens.
Q. In your second interview in 1994, you were asked, "Did you ever have any discussion with Michael Jackson about whether you should tell anybody about the things you described?" Remember that?
A. (Shakes head from side to side.)
Q. You don't? Okay.
A. No, I don't.
Q. Okay. Do you remember telling the interviewers, when you were asked do you remember anything that he said, you said, "No, I'm working on that"?
A. No.
MR. ZONEN: I'll object as to which interview; vague.
MR. MESEREAU: In the second interview, I'm sorry.
Q. In the second interview -- let me rephrase 4941

the question. I'll withdraw it.
In the second interview in 1994 - okay? --
A. Okay.
Q. -- that was recorded - all right? - when
asked if Mr. Jackson said anything to you about
whether you should discuss what happened, do you
remember telling the interviewers, "No, but I'm
working on that"?
A. I do not remember that.
Q. Would it refresh your recollection if I show
you the transcript?
A. No. But -- you could bring it over.
Q. Well, I can't unless you're willing to see
if it refreshes your recollection.
A. Okay. Bring it over. I'll give it a shot.
I'll read it just to see if it refreshes my memory.
MR. MESEREAU: May I approach?
THE COURT: Yes.
MR. ZONEN: Page, Counsel?
MR. MESEREAU: Yes. Pages 105, 106.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to
review those pages --
A. I have.
Q. -- of your transcript?
Do they refresh your recollection about what
you said on that subject?
A. No, it does not. 4942

Q. It doesn’t.
A. Sorry.
Q. Now, in that interview you indicated that you were aware that another boy had sued Mr. Jackson seeking money, right?
MR. ZONEN: I’m sorry, which interview? Objection.
MR. MESEREAU: I’m sorry, the second -- let me rephrase it.
Q. In the second interview that you gave in 1994 - okay? --
A. Okay.
Q. -- you indicated that you were aware that someone else had sued Mr. Jackson for money, correct?
A. I don’t remember.
Q. Would it refresh your recollection to look at the transcript?
A. Probably not.
Q. Okay.
A. Both of them are really blurry. It was just hard for me at the time.
Q. Well, let me ask you this.
A. Okay.
Q. Looking back, when is the first time you recall you knew someone else had sued Mr. Jackson looking for money?
A. Probably 16. 4943

Q. Excuse me?
A. I was probably 16. Because that's when money started being an issue for me.
Q. Okay. Now, in your last interview with Prosecutor Zonen - and I'm talking about an interview on November 19th, 2004, okay? - Mr. Cannon was present, right?
A. I don't know.
Q. Do you recall Mr. Cannon not wanting a defense investigator present?
A. No, I don't recall.
Q. Did you know anything about that?
A. No.
MR. MESEREAU: Okay. At this time, I have no further questions, Your Honor.
THE COURT: All right. Redirect?

REDIRECT EXAMINATION
BY MR. ZONEN:
Q. Mr. Francia, did you get any money from Mr. Jackson for reading a book?
A. I don't think so.
Q. Did you ever get any money from Mr. Jackson for getting A's?
A. I don't think so.
Q. Were grades a problem for you when you were in school about that time?
A. Shoot, through all my whole life, grades 4944

were a problem.
Q. Did you -- do you sometimes have difficulty with reading?
A. Yeah.
Q. At this time even?
A. Yeah.
Q. All right. A lot of questions were asked of you by Mr. Mesereau that dealt with that first interview that took place in 1993, the first time that there was a disclosure. And you indicated, I believe, that what you said toward the end of the interview was very different than what you said at the beginning of the interview. Would you explain that for us, please? Why is that?
A. Why there was a difference in the beginning and --
Q. Yes.
A. Because in the beginning, I thought I could hold them off and make them go away. And they didn't go away. At all. It's kind of an issue when I was 13. I didn't want to tell anybody that I'd been molested; that I didn't want to tell anybody that anything ever happened to me. That's weird.
Q. Why?
A. Because you're 13. That's weird.
Q. What were the issues that you were dealing with at that time about that?
A. In fifth grade, I told my friends that I 4945

knew Michael Jackson, and I thought it was cool. My friends thought it was cool. They didn't believe me. But they thought it was cool.
In junior high, it's no longer cool to know somebody that had issues with kids, because then they're going to make fun of you.
And even at the church, they made fun of me.
At the church, worse than school, they made fun of me.
Q. And you were actually teased?
A. Yeah.
Q. You said yesterday to one of Mr. Mesereau's questions that you told the detective, "No, I'm not gay." Did you make that statement to them?
A. I remember listening to it in the tape. I don't recall saying that. But I remember listening to it on the tape.
Q. Do you recall whether or not that was an issue for you during the course of that interview, that that was one of your concerns, that people would see you as that?
A. Yes. That was a concern of mine.
Q. You mentioned yesterday to one of Mr. Mesereau's questions that the defendant put the money down your pants. Would you describe that for us?
A. What do you want to know?
Q. Where did the money go? In other words, 4946

when he -- when he gave you money, did he hand it to you, or did he do something else? And if so, tell us what that is.
A. He put the money in my shorts, because I pulled it out, and that's when my mom saw -- noticed that I had pulled money out of my shorts and she asked me where I got it from.
Q. Do you remember which of the three occasions this was?
A. I can't remember whether it was the first or the second.
Q. But this was back when you were young?
A. Yeah.
Q. Seven or eight?
A. Seven or eight.
Q. You say in your shorts. What are we talking about? In a pocket?
A. I don't think my mom put pockets on the shorts.
Q. That was a little more complicated?
A. She's a good seamstress, but I don't think for shorts.
Q. Tell us as best you can recall where would that money have been.
A. That would have been in my shorts.
Q. I'm sorry?
A. It would have been in my shorts.
Q. In the inside? 4947

A. In the inside.
Q. Do you know if the money was in your underwear?
A. I don't. I don't know.
Q. Mr. Mesereau asked you yesterday questions about whether you talked to your mother about what had happened, and if so, to what extent. Did you ever have a conversation with your mother where you told her that you were molested?
A. I think I told her that I was molested in counseling, because then she shared that she was molested as well.
Q. Okay. Did you ever tell her the details of the molestation?
A. No.
Q. What had happened, how it happened, how often it happened, any of those types of details?
A. I don't think so.
Q. To this day, have you ever?
A. To this day. My wife found out on the stand.
Q. The details you had not yet told your wife?
A. Right.
Q. Have you ever told anybody the details other than your therapist?
A. My pastor.
Q. Your pastor?
A. And I don't think I told him the details. 4948

MR. ZONEN: Thank you. I have no further questions.
THE COURT: Recross?
MR. MESEREAU: No further questions, Your Honor.
THE COURT: All right. You may step down. He needs to move away.
MR. SNEDDON: Don't forget your jacket. Call Kris Kallman, Your Honor.
THE COURT: Come forward to the witness stand, please. When you get to the witness stand, remain standing. Face the clerk and raise your right hand.

KRIS KALLMAN
Having been sworn, testified as follows:

THE WITNESS: Yes.
THE CLERK: Please be seated. State and spell your name for the record.
THE WITNESS: My name is Kris, K-r-i-s, Kallman, K-a-l-l-m-a-n.
THE CLERK: Thank you.

DIRECT EXAMINATION
BY MR. SNEDDON:
Q. Good morning, Mr. Kallman.
A. Good morning, Mr. Sneddon. 4949

Q. You're an attorney?
A. Yes.
Q. Licensed to practice in the State of California?
A. Yes, sir.
Q. And what is your brief educational background to prepare you for the practice of law in the State of California?
A. Well, I graduated from Santa Barbara High School. Went to Santa Barbara City College. Graduated from Cal Poly San Luis Obispo. Went to Pepperdine University Law School.
Q. Do you have a certain area of law that you specialize in?
A. Yes. I am a civil trial lawyer, and for the most part, I represent people that get injured due to the fault of another person or company.
Q. How long have you been practicing law in the State of California?
A. 29 years.
Q. And how long have you lived in Santa Barbara County?
A. My whole life, except when I was away at college.
Q. And where do you live in Santa Barbara County?
A. I live in Santa Barbara, on the mesa, in the city. 4950

Q. Now, during the time that you've practiced law in Santa Barbara County, have you had associates that have practiced with you in your firm?
A. Yes.
Q. Are you a sole practitioner?
A. Essentially. Although I currently have two lawyers that office with me and they act as "of counsel." They're not employees, but they help me out on cases.
Q. Are you familiar with an attorney by the name of Terry Cannon?
A. I sure am.
Q. And how long have you known Mr. Cannon?
A. Oh, I've known Mr. Cannon for at least 20 years.
Q. And at some point in time prior to today, was Mr. Cannon one of the people who was associated with you in the practice of -- your civil practice?
A. Yes.
Q. And during what period of time was that; do you recall?
A. Well, the relevant period here would have been in the early to mid '90s.
Q. And at that time Mr. Cannon was practicing with you?
A. He was associating with me on certain cases.
Q. And do you recall where Mr. Cannon was residing at that particular point in time? 4951

A. I believe he was living in Santa Barbara.
Q. Now, at some later time, did Mr. Cannon leave your association and take up the practice of law somewhere else?
A. Yes.
Q. To your knowledge, where was that?
A. In Oregon.
Q. And then after that, did Mr. Cannon come back?
A. He came back to San Luis Obispo County, and then moved to San Diego County.
Q. And at this particular point in time, do you know where Mr. Cannon is?
A. Not exactly this moment. But I happen to know that he bought a condominium here in Orcutt.
Q. And is he, once again, associated with you in the practice of law?
A. Yes, sir.
Q. Now, did you have occasion to represent Jason Francia in some litigation?
A. He and his mother, yes.
Q. And can you tell us, did you ever prepare a lawsuit on behalf of Jason Francia?
A. We prepared a Complaint, which is a document that's the beginning of a lawsuit, yes.
Q. And when you say "we," who's "we"?
A. Mr. Cannon and myself.
Q. So Mr. Cannon was working with you on that 4952

particular case?
A. Yes, sir.
Q. And after the preparation of that document -- well, with regard to that document, what were the allegations set forth in the proposed Complaint to be filed?
A. Well, it's been --
MR. MESEREAU: Objection. Hearsay; relevance.
THE COURT: Sustained.
Q. BY MR. SNEDDON: Who was the individual that the Complaint was directed towards?
A. Mr. Jackson.
Q. At some point in time, did you have contact with individuals who were representing Mr. Jackson over the proposed filing of the criminal -- of the civil complaint?
A. Yes.
Q. And who did you make contact with?
A. Initially our contacts were with Johnnie Cochran and his associate, Carl Douglas.
Q. Do you recall approximately when it was when you first made contact with Mr. -- or when contact was made between you and Mr. Cochran and Mr. Douglas?
A. It was either late '94 or early '95.
Q. Did you, after your conversations with those individuals, file the civil lawsuit? 4953

A. No.
Q. At some point in time later, were you then dealing with other lawyers with regard to the proposed filing of that civil lawsuit?
A. Yes. At some point, Mr. Jackson's representation was assumed by a lawyer named Zia Modabber, and a lawyer named Howard Weitzman.
Q. And do you recall approximately when it was that you then began contact with those particular individuals?
A. I believe it was in mid 1995.
Q. And the purpose of those contacts?
A. Well, the --
MR. MESEREAU: Objection. Vague; foundation.
THE COURT: Overruled.
You may answer.
THE WITNESS: The purpose of the contacts was that they knew that we had a Complaint that we were about to file in Santa Barbara County Superior Court, and they didn't want us to do that.
MR. MESEREAU: Objection. Hearsay; foundation.
THE COURT: The answer is stricken.
Sustained.
Q. BY MR. SNEDDON: As a result of the conversations between these individuals, did you pursue your lawsuit? 4954

A. Well, we never filed the lawsuit.
Q. Did you reach an agreement, a settlement agreement?
A. Yes, we did.
Q. Did you reach a settlement agreement in which Jason Francia received monetary compensation from Mr. Jackson?
A. Yes, sir.
Q. Did you receive -- did you reach an agreement in which Blanca Francia received monetary compensation from Mr. Jackson?
A. Yes, we did.
Q. During the time that you were representing -- during the time that you had prepared a Complaint ready to be filed and you were in contact with attorneys representing Mr. Jackson, can you give the ladies and gentlemen of the jury an idea of how old Jason Francia was at that particular point in time?
A. Well, he was about 14 years old. He's 24 now, as I understand it, and we're talking about things that happened just about exactly ten years ago.
Q. And in your position as a civil litigator, at the time that an individual is of minority, at the age of 14, how do you deal with representing a person like that?
A. Well, a child -- 4955

MR. MESEREAU: Objection. Vague;
foundation; relevance.
THE COURT: Overruled.
You may complete your answer.
THE WITNESS: A child, under California law,
under the age of 18, is not permitted to enter into
a contract. I suppose he or she could, but it
wouldn't be enforceable. So the only way a child
can act legally is through a guardian ad litem. And
it's normally the parent and normally the mother.
Q. BY MR. SNEDDON: Was that the case in this
particular instance?
A. Yes.
Q. Now, during the course of the time that you
were involved in obtaining a settlement from Mr.
Jackson on behalf of the Francias, did you deal
personally with Jason at any time?
A. Yeah. Sure.
Q. In what respect?
A. Well, I knew who he was, I met with him. I
met with he and his mom. He was a teenaged boy, and
a nice young man.
Q. Now, at some point in time was Jason
required to sign some kind of documents in
conjunction with the settlement?
A. Yes. When he turned 18, part of the
condition was that he sign a confidentiality
agreement. 4956

Q. Now, with regard to the confidentiality --
and to your knowledge, did he sign that?
A. Yes.
Q. And with regard to the confidentiality
agreement, did it have a provision that required
notice to Mr. Jackson in the event that Jason
Francia talked to anybody?
MR. MESEREAU: Objection. Leading; move to
strike.
THE COURT: Overruled.
You may answer.
THE WITNESS: I believe so, yes.
Q. BY MR. SNEDDON: And what was the
requirement notice in the confidentiality agreement
with regard to notice to the defense?
A. I believe it's five days.
Q. And were you at some point contacted by Mr.
Zonen of our department with regard to interviewing
your -- Jason Francia?
A. Yes.
Q. And in that particular case, did you
indicate to Mr. Zonen that you would have to do
something before you could agree with that?
A. Yes.
Q. And what was that?
A. Well, I'd have to notify somebody on Mr.
Jackson's legal staff that they wanted to talk to
him. 4957

Q. And did you do that?
A. Yeah. Yes. Excuse me.
Q. And did you then grant permission for Mr. Zonen to have a conversation with your -- with Jason Francia?
A. Yes.
Q. Now, were you present during the conversations between Jason Francia and Mr. Zonen?
A. I don't think so. I think I was there, and then I think I had to go to another court or something like that. I don't remember being an integral part of any of those -- if there was more than one, I don't even know.
Q. And I'm talking about the conversations that occurred after you gave notice to the defense in this case, or gave notice to Mr. Jackson. To your knowledge, was Mr. Cannon present?
A. I believe so. At least for part of it. Again, I'm not certain.
Q. Do you remember when it was that you finally -- the year that you finally reached a settlement agreement with Mr. Jackson?
A. Yes. It's been a long time. But it was a big deal. And I do remember --
MR. MESEREAU: Objection. Nonresponsive; move to strike.
THE COURT: The answer is stricken. Nonresponsive. 4958

Q. BY MR. SNEDDON: Just --
A. Yes.
Q. And what year was that, approximately?
A. It was either ‘95 or ‘96, I believe.
THE COURT: Counsel, we’ll take our break.
(Recess taken.)
--o0o--

REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 4902 through 4959 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on April 5, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, April 5, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

TUESDAY, APRIL 5, 2005

8:30 A.M.

(PAGES 4961 THROUGH 5156)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 4961

APPEARANCES OF COUNSEL:

For Plaintiff: THOMAS W. SNEDDON, JR.,
District Attorney -and-
RONALD J. ZONEN, Sr. Deputy District Attorney
-and- GORDON AUCHINCLOSS,
Sr. Deputy District Attorney 1112 Santa Barbara Street
Santa Barbara, California 93101

For Defendant: COLLINS, MESEREAU, REDDOCK & YU BY: THOMAS A. MESEREAU, JR., ESQ.
-and- SUSAN C. YU, ESQ.
1875 Century Park East, Suite 700 Los Angeles, California 90067
-and-
SANGER & SWYSEN
BY: ROBERT M. SANGER, ESQ. 233 East Carrillo Street, Suite C
Santa Barbara, California 93101
-and-
OXMAN and JAROSCAK BY: R. BRIAN OXMAN, ESQ.
14126 East Rosecrans Boulevard Santa Fe Springs, California 90670

I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Nicola is listed as “N” on index. Mr. Mesereau is listed as “M” on index.
Ms. Yu is listed as “Y” on index. Mr. Sanger is listed as “SA” on index.
Mr. Oxman is listed as “O” on index.

PLAINTIFF’S WITNESSES	DIRECT	CROSS	REDIRECT	RECROSS
KALLMAN, Kris	4966-M			
FRANCIA, Blanca	4977-Z	5057-M	5130-Z	5154-M

1 E X H I B I T S
2 FOR IN
3 PLAINTIFF'S NO. DESCRIPTION I.D. EVID.
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THE COURT: Counsel?
MR. SNEDDON: Your Honor, I've just about completed my examination. But I would request if we could approach the bench for just one second. I don't want to run afoul of the Court.
THE COURT: All right.
(Discussion held off the record at sidebar.)
THE COURT: (To the jury) All right. Knock it off.
(Laughter.)
THE COURT: Okay. Counsel, you may proceed.
MR. SNEDDON: All right.
Q. Mr. Kallman, I think I just have a couple questions left.
I think where we were headed before the break was you told us the approximate year in which the case actually reached a settlement.
And what I wanted to know was, after the settlement of the case, have you kept in contact with Jason over the years?
A. Yes.
Q. And to your knowledge, has Mr. Cannon kept in contact with Jason over the years?
A. I believe so.
Q. Now, with regard to the lawsuit that was contemplated against Mr. Jackson at the time, the basis of the -- of the nature of the representation of Jason Francia involved inappropriate sexual 4965

conduct against Jason by the defendant, Mr. Jackson?
A. Yes.
MR. SNEDDON: Nothing further, Your Honor.
THE COURT: Cross-examine?
MR. MESEREAU: Yes, please. Your Honor.

CROSS-EXAMINATION
BY MR. MESEREAU:
Q. Good morning, Mr. Kallman.
A. Good morning.
Q. My name is Thomas Mesereau and I speak for Mr. Jackson.
A. Pleasure to meet you.
Q. I want to ask you some questions about the settlement agreement you referred to in response to the prosecutor's questions, okay?
First of all, you had separate settlement agreements for the mother, Blanca Francia, and the son, Jason Francia, correct?
A. I believe so. I can tell you, I have not reviewed this material and it's been ten years, but I believe that was the case. Some of this I'm going to have to take your word for it.
Q. Well, I can show you a copy if you need it.
A. I don't disbelieve that.
Q. Okay. The settlement agreement with Blanca Francia was entered into approximately April 1st, 1996, right? 4966

A. I don’t know.
Q. Would it refresh your recollection if I show you a copy of the agreement?
A. Sure.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: That’s what it says.
Q. BY MR. MESEREAU: The settlement agreement with Jason Francia was entered into approximately June 1st, 1998, right?
A. Don’t know.
Q. Would it refresh your recollection if I just show you a copy of it?
A. Sure.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: That’s what it says.
Q. BY MR. MESEREAU: Okay. Now, that would suggest, wouldn’t it, that the mother had agreed to get money for herself before there was any agreement for Jason to get money in a settlement, right?
A. No, it was all part of one global settlement.
Q. Then why would there be a two-year difference between the execution of those settlement agreements?
A. Remember when I told the jury that a minor can’t enter into a contract? 4967

Q. Yes.
A. Jason wouldn't have been able to sign before he was 18. My guess is that's probably when he turned 18, and that's what Mr. Weitzman and Modabber wanted.
Q. And then just for the jury's benefit, why would the mother sign in '96?
A. She was an adult. She could sign.
Q. The point I'm making is that she had a separate settlement from her son.
A. Exactly. I mean -- yes. She got money.
Q. Yes. Okay. Now, the prosecutor asked you some questions about provisions in the settlement agreement, okay? And one of the issues that was carefully negotiated by the people representing Mr. Jackson was that he deny any wrongdoing in that agreement, right?
A. Again, the best evidence of that would be what's in the agreement. I don't remember what's in there.
Q. Okay. Well, let me -- the prosecutor read you a provision, asked you about it.
Let me ask you about this: There was language in that agreement that said, "The parties acknowledge that Jackson has elected to settle the claims solely in view of the potential impact any litigation could have in the future on his reputation, earnings and potential income, and not 4968

because of any alleged wrongful conduct on his part," right?
A. If you're asking me if that's in the document, I'll have to take your word for it. You don't need to show it to me. It sounds pretty standard to me.
Q. The agreement further said -- excuse me, let me rephrase that.
Both agreements, the one involving Jason and the one involving Blanca, his mother, both had language which said, "This agreement shall not, in any manner, be construed as an admission by Jackson that he has acted wrongfully with respect to Francia, Blanca, or any other person, or at all, or that Francia or Blanca have any rights whatsoever against Jackson or Jackson's releasees." Sound familiar to you?
A. It sounds like standard language in virtually every release that I deal with. But, yes, it does sound familiar.
Q. Actually, there's a whole separate paragraph entitled, "Denial of Claims by Mr. Jackson," correct?
A. Don't know.
Q. Would it refresh your recollection if I show you a copy?
A. It would.
MR. MESEREAU: May I approach, Your Honor? 4969

THE COURT: Yes.
THE WITNESS: It does refresh my recollection.
Q. BY MR. MESEREAU: Okay. And do you recall that language being in both agreements?
A. I believe so, yes, sir.
Q. Okay. In addition to the language that I have read, there's further language which says, "Jackson specifically disclaims any liability to, and denies any wrongful acts against, Francia, Blanca or any other person and may continue to do so publicly, to the extent reasonably necessary, to respond to any inquiries in this regard." Right?
A. Correct.
Q. It said further, "The parties acknowledge that Jackson is a public figure, and that his name, image and likeness have commercial value and are an important element of his earning capacity." Right?
A. That's true.
Q. And that language was in both settlement agreements, the one involving Blanca Francia and the one involving Jason Francia, correct?
A. I don't remember that. I will take your word for it. You don't need to refresh my recollection. It sounds like it should be or would be.
Q. Now, Mr. Kallman, provisions in which a settling party denies liability are fairly standard 4970

in settlement agreements, right?
A. True.
Q. But the language that I just read to the jury is not standard language in a settlement agreement, is it?
A. This is not a standard case, or was not. And no, you're right. These were carefully drafted by a team of lawyers, and we agreed to the terms.
Q. And the reason those terms are different is because Mr. Jackson is an unusual individual in terms of his need to preserve his reputation and public image so he can earn a living, right?
MR. SNEDDON: Calls for speculation on this. It wasn't drafted by him. No foundation.
MR. MESEREAU: I think it was drafted by this witness.
THE COURT: All right. I'll sustain a foundation.
MR. MESEREAU: Okay.
Q. When you settled these matters - and I'm talking about matters involving Michael Jackson, Blanca Francia, and Jason Francia - you put in language involving denial of claims by Mr. Jackson that was not standard language in a typical settlement agreement, right?
MR. SNEDDON: Your Honor, I'm going to object to the question as lack of foundation; that he put the language in there. 4971

THE COURT: Well, that was the foundation I was looking for.
So I'll allow you to answer the question as long as you understand the limitations of your answer.
THE WITNESS: Well --
THE COURT: If you put the language in.
THE WITNESS: I didn't draft that agreement.
THE COURT: Okay.
Q. BY MR. MESEREAU: Did lawyers from your office draft the agreement?
A. No.
Q. Who drafted the agreement?
A. Somebody in Mr. Modabber's office, the Katten, Muchin, Zavis & Weitzman firm in Century City.
Q. Did you have any input into the language in the agreement?
A. Only to review it. And if there was language we found objectionable, we could strike it, I suppose.
Q. Okay.
A. But they wanted that in there, and I didn't find it objectionable.
Q. Okay. Now, you made a statement, I believe, in response to the prosecutor's questions, that if someone from law enforcement wanted to speak to your client, you had to first notify representatives of 4972

Mr. Jackson, true?
A. True.
Q. That -- really, that language is not in that agreement, is it?
A. I don't know.
Q. Then why would you say it?
A. Because that's part -- in one of the agreements, I have to give notice to the defense team. And I've given notice once to Mr. Sanger. And then when I got subpoenaed on Friday, I gave notice to Mr. Modabber down in Los Angeles.
Q. But the notice you're supposed to give to the defense team does not involve requests by law enforcement to speak to your client, does it?
A. I assume that anybody from law enforcement that wants to talk to my client, there was a requirement to notify somebody from the defense team.
Q. Nowhere in those settlement agreements is there language to that effect, is there?
A. I have no idea.
MR. SNEDDON: Object as immaterial; irrelevant.
MR. MESEREAU: The prosecutor brought it up on direct, Your Honor.
THE COURT: The objection is overruled. And the answer came in as, "I have no idea."
Q. BY MR. MESEREAU: It would be against public 4973

policy for a civil litigator to put language in a
settlement agreement precluding anyone from
cooperating with law enforcement, wouldn't it?
A. In my opinion, yes.
Q. Lawyers are not allowed to have language
like that in settlement agreements, right?
A. Wrong.
Q. Pardon me?
A. No. It's a notice requirement. It's not a
preclusion requirement.
Q. When did you last review the notice
provisions in these agreements?
A. Probably in 1996 or 1997.
Q. Well, let me ask you this question: Did you
talk with Mr. Sneddon about what questions he was
going to ask you before you testified today?
A. No. I mean, we talked, but it was very,
very general and I don't think the conversation was
more than five or ten minutes long.
Q. Okay. The notice provisions that you
describe talk primarily about anyone who's suing Mr.
Jackson or if he's contacted by the media, correct?
A. I don't -- not the notice provisions I'm
thinking about. I think there's a specific
provision -- it may not be in that agreement. Maybe
it's in another agreement, but there's a provision
that I'm supposed to contact either Johnnie Cochran
or Zia Modabber or somebody on the defense team if 4974

there was a request to speak or interview my clients.
Q. But never in the agreement did it refer to law enforcement, right?
A. That I don't remember. It's been a long time.
Q. Okay. Okay. Now, you answered some questions about Terry Cannon.
A. Yes, sir.
Q. When did -- excuse me, you're currently associated with Mr. Cannon, correct?
A. He is "of counsel" to my law firm.
Q. When did he become "of counsel" to your law firm.
A. He's been "of counsel" twice. Once about ten years ago, during this period, and then again just recently, within the last two months.
Q. So he wasn't "of counsel" to your law firm in October, November and December of last year, right?
A. I don't believe so, but I can't be sure.
Q. During October, November and December of last year, he was with the District Attorney's Office in San Diego, wasn't he?
A. Well, I know he recently retired from the San Diego D.A.'s Office. I don't know precisely when he retired, but you're right, it's been recent.
MR. MESEREAU: Okay. No further questions, 4975

Your Honor.
MR. SNEDDON: No questions, Your Honor.
THE COURT: All right. Thank you. You may step down.
THE WITNESS: Thank you, Your Honor.
MR. ZONEN: We'll call Blanca Francia to the stand.
THE COURT: Come to the front of the courtroom, please.
When you get to the witness stand, remain standing. Face the clerk over here, and raise your right hand.
Remain standing.
BAILIFF CORTEZ: Remain standing.
THE COURT: Face the clerk here. Right over here.
BAILIFF CORTEZ: Right over there, please.

BLANCA FRANCIA
Having been sworn, testified as follows:

THE WITNESS: Yes, I do.
THE CLERK: Please be seated. State and spell your name for the record.
THE WITNESS: Blanca Francia. B-l-a-n-c-a; F-r-a-n-c-i-a.
BAILIFF CORTEZ: Ma'am, you need to move over here, please. 4976

THE WITNESS: Oh.
MR. ZONEN: Would you like her to spell her name again?
THE COURT: Did the court reporter get the spelling?
THE REPORTER: Yes.
THE COURT: That's fine.
THE JURY: (In unison) We didn't.
(Laughter.)
THE COURT: Yes, please ask her to spell her name again.
MR. ZONEN: Could you please spell your name again?
THE WITNESS: B-l-a-n-c-a; F-r-a-n-c-i-a.

DIRECT EXAMINATION
BY MR. ZONEN:
Q. Miss Francia, good morning.
A. Good morning.
Q. Do you currently live in Santa Barbara County?
A. Yes.
Q. Up in the North County area?
A. Uh-huh.
Q. Are you the mother of Jason Francia?
A. Yes, I am.
Q. What kind of work are you currently doing?
A. Caregiving. 4977

1 Q. All right. What we need to do, we have a
2 problem here. And it's not just with you, a lot of
3 witnesses. You have to be as close as you can get
4 to the microphone so that you can be heard all the
5 way to the back of the courtroom. Okay?
6 A. Okay.
7 Q. All right. Are you the mother of Jason
8 Francia?
9 A. Yes.
10 Q. And what kind of work are you currently
11 doing?
12 A. Caregiving.
13 Q. I'm sorry?
14 A. Caregiving.
15 Q. And what does that mean, a caregiver?
16 A. Taking care of elderly people. Disabled.
17 Q. Do you have a couple clients who you work
18 for?
19 A. Yes.
20 Q. And are they disabled in some fashion?
21 A. Yes. I deal with one six years, almost six
22 years, yeah.
23 Q. Okay.
24 A. And another one just recently, about a
25 couple of months.
26 Q. And how long have you been doing this kind
27 of work?
28 A. On and off, I've been doing it for about 15 4978

1 years.
2 Q. And prior to that, what kind of work did you
3 do?
4 A. Housekeeping. Housecleaning.
5 Q. And for what period of time did you do that
6 work?
7 A. Since I came to the country.
8 Q. When did you come to the United States?
9 A. 1975.
10 Q. And from what country did you come from?
11 A. El Salvador.
12 Q. You have been to -- in this country
13 continuously since 1975?
14 A. Yes.
15 Q. Have you been back to El Salvador to visit
16 at all?
17 A. A couple of times.
18 Q. Your English, how did you learn English?
19 Did you go to school?
20 A. No.
21 Q. How did you learn English?
22 A. Reading, and listening to people, and
23 that's --
24 Q. How old were you when you came to this
25 country?
26 A. About 21.
27 Q. Okay. Do you know Mr. Jackson, Michael
28 Jackson? 4979

A. Yes.
Q. Do you see him in this courtroom?
A. Yes.
Q. Would you indicate where he is sitting,
please?
A. He's sitting right there.
MR. ZONEN: Your Honor, could the court
record reflect that the witness has identified the
defendant?
THE COURT: All right.
Q. BY MR. ZONEN: How do you know Mr. Jackson?
A. I work -- work about five years.
Q. When did you begin working for Mr. Jackson?
A. 1986.
Q. And where did you begin working for Mr.
Jackson, at what location?
A. Havenhurst. Encino, California.
Q. Havenhurst is the name of the street?
A. Yes.
Q. And was there a house on that street --
A. Yes.
Q. -- where he lived?
All right. What were you doing for Mr.
Jackson at the Havenhurst residence?
A. I was hired to be his personal housekeeper.
Q. Were there other members of the Jackson
family living at the Havenhurst residence?
A. Yes. 4980

Q. Can you tell us who they were?
A. At that time Janet and LaToya, and his father and mother.
Q. Would you describe the Havenhurst residence for us, just briefly? A large home?
A. Their whole house? Yeah. He has his separate quarters in the house. But it was in the same house.
Q. Okay. Was it a large home?
A. Yes.
Q. And his quarters, were you responsible for just his quarters or did you clean in the whole house?
A. Well, yes, just his quarters. His place. But eventually when he will go out on tour, I will stay at the house and help the household.
Q. You would clean the rest of the house as well?
A. Uh-huh.
Q. Did Mr. Jackson ever have an additional residence other than the residence on Havenhurst?
A. After I was there for about a year, I think, or less than a year, he got another one. Like -- kind of an apartment, suite. Called it “The Hideout.”
Q. Where was that; do you know?
A. I know it’s on Wilshire. And I don’t know the other street. 4981

Q. And describe that location for us, if you would.
A. What do you mean?
Q. Tell us what it was like, his apartment.
A. Oh.
Q. Or his residence. How many rooms in it; do you know? Do you recall?
A. Three. It had a master bedroom, and two other rooms, bedrooms.
Q. Did it have a living room?
A. Yes.
Q. I assume a kitchen?
A. Kitchen, and another little room.
Q. Okay. At least a couple bathrooms?
A. I don't remember.
Q. You don't recall --
A. No.
Q. -- how many bathrooms?
A. I don't remember.
Q. It's okay. Do you recall for what period of time you cleaned that residence?
A. For about a year.
Q. Was he living at that residence during that time, Mr. Jackson?
A. Yeah, he totally move his --
Q. I'm sorry?
A. He totally move from Encino to that hide -- to that place. He move his office to -- to near 4982

that location.
Q. Okay. Was there a bed at that residence?
A. No.
Q. Never?
A. Never.
Q. The whole time that you were cleaning there?
A. Yeah.
Q. Okay. Did you go to a different location after the hideout? Was there yet another residence?
A. Yeah, he was in process to get a ranch.
Q. Okay.
A. In Los Olivos.
Q. And was that Neverland?
A. Yeah.
Q. Was that the ranch that he actually did purchase?
A. Uh-huh. Yes.
Q. Did he move to that ranch?
A. Eventually, yeah. But he was on and off. They sent me over here before he moved in. I mean --
Q. I'm not sure I understood that, "They sent me over here before he moved in." Who is "they," first of all?
A. Well, they arrange, Mr. Jackson and Bill Bray and one of the secretaries.
Q. Okay. Bill Bray was who?
A. His personal assistant I guess. 4983

Q. All right. And you said, “They sent me here.” Where is “here”?
A. Santa Maria.
Q. Santa Maria. So did you actually move to Santa Maria?
A. Yeah. They pay me to move here.
Q. And did you move with your child?
A. Yes.
Q. Is Jason your only child?
A. My only son.
Q. Did Jason grow up with his father at all?
A. No.
Q. Has he had contact with his father at all?
A. No.
Q. How old was Jason when you moved to Santa Maria?
A. I guess about nine.
Q. About nine years old?
A. Eight or nine, yeah.
Q. Okay. Did you continue working for Mr. Jackson after you moved to Santa Maria?
A. Excuse me?
Q. Did you continuing to work for Mr. Jackson --
A. Yes.
Q. -- after you moved to Santa Maria?
A. Yes.
Q. And was that at Neverland?
A. Yes. 4984

Q. All right. What were your responsibilities at Neverland? What did you do for Mr. Jackson?
A. To clean his room.
Q. I'm sorry?
A. To clean his bedroom. And taking care of his clothes and his personal stuff.
Q. All right.
A. His -- all his -- you know, whatever he needed. And to clean up and arrange all his clothes, press them, iron them, and, you know, everything.
Q. What was your schedule at Neverland? How often did you work there?
A. In the beginning, I think I was just -- he was there, I will come, you know, and work for three days, whatever time he will stay there, and then, you know, not to be there for another two days. But eventually he move to -- like to 9:00 to 5:00.
Q. Five days a week?
A. Five days a week. Six days.
Q. Six days? Did you ever work more than 9:00 to 5:00?
A. Yeah.
Q. Your hours, times, would they vary different days?
A. Yeah. Christmastime and -- you know, whatever time they needed me, because he was there.
Q. Were there occasions that you would work 4985

late?
A. Yes.
Q. And you say six days a week. Was that
common?
A. Was that what?
Q. Was that a common event, that you would work
six days a week?
A. Yeah.
Q. Okay. During that time, did you ever bring
Jason with you to work? And by “this time,” I’m
referring to at Neverland.
A. Yes.
Q. Okay. Did you ever bring Jason to work with
you at the Havenhurst residence in Encino?
A. Yes, it was.
Q. Did you ever bring Jason to work with you at
the hideout on Wilshire Boulevard?
A. Yeah.
Q. And why did you do that?
A. Well, the first time I didn’t know that
I was allowed to do it. But Mr. Jackson asked me
to -- to bring him.
Q. You said the first time. Where was that?
A. At the Encino house.
Q. At the Encino house?
A. Yeah.
Q. Did he say why?
A. He just told me to bring him. 4986

Q. Okay. And did you bring him on occasion?
A. Yeah. From then on, he was there a lot of
times.
Q. Okay. How often would you bring him to the
residence at Encino?
A. Probably every weekend. And probably twice
a month, then, different -- differently. I don't
remember.
Q. Was that schedule more or less at the
hideout? Did you bring him to the hideout as often?
More often?
A. Uh-huh.
Q. Less often? What?
A. Not a lot of times, because he was in
school, so probably on Saturday or Sundays.
Q. Did you continue cleaning at the hideout
even after Mr. Jackson moved to Neverland in '88?
A. Yes.
Q. How often?
A. Probably every week. Sometimes twice a
week.
Q. At Neverland, what were your specific
responsibilities? What were your obligations? What
did you do at Neverland?
A. Do you mean for him?
Q. Yes, for Mr. Jackson. Yes.
A. Like I said, taking care of his clothes, his
room. 4987

Q. Okay.
A. And right after he leave the room, I will have to clean it right away, because sometime he will stay there, you know, he'll come out, and then he'll go back in right away.
Q. Okay. Were your responsibilities beyond his room as well? In other words, did you clean the rest of the house?
A. Yes.
Q. Did you ever clean other buildings at Neverland?
A. Yes.
Q. The arcade?
A. The arcade, yeah.
Q. The theater?
A. The theater.
Q. Okay.
A. Yeah.
Q. Most of the time where did you work?
A. In the house.
Q. Were there other maids at Neverland --
A. Yes.
Q. -- who were -- there were other maids at Neverland?
A. Yes.
Q. Yes, all right. At any given time, how many maids were working at Neverland at any given time?
A. Maybe about six. 4988

Q. Were there others who had responsibility for cleaning Mr. Jackson's bedroom?
A. No.
Q. You were the only one?
A. Yeah.
Q. Did you have a key?
A. Yes.
Q. Is that the only way you got in?
A. Yeah.
Q. Was there a combination lock at any point?
A. No.
Q. Not while you were there? Is that a key that you carried around with you?
A. Yes.
Q. Okay. Would you just let yourself in?
A. Yes.
Q. How would you announce your presence? How would you let Mr. Jackson know you were coming in, if, in fact, he was there?
A. I'll knock.
Q. Uh-huh. Now, could you describe the suite that is his bedroom? It's actually more than one room; is that right?
A. Yeah. It's two rooms. One downstairs and one upstairs.
Q. And is there a hallway that goes into it?
A. Closet.
Q. I'm sorry? 4989

A. A closet.
Q. There's a closet, okay.
A. Yeah.
Q. When you go --
A. A walk-in closet.
Q. When you go into his suite, do you go through a door that is locked?
A. No.
Q. All right. Is there any way of securing his bedroom suite?
A. Well, his bedroom suite, with a key --
Q. Yes.
A. -- that I would have.
Q. Where is that door, the one that you unlock with the key that you carry?
A. In the hallway.
Q. In the hallway?
A. Yeah.
Q. So you unlock that door and you go through that door. And where do you find yourself at that point?
A. Yeah.
Q. I'm sorry?
A. Yes.
Q. Where are you? As soon as you walk through that door, the door that you unlock, where are you at that point? Are you in a room or a hallway?
A. In the bedroom. 4990

Q. In the bedroom, all right.
A. Uh-huh.
Q. Was there at that time some kind of an alarm or a bell?
A. Yeah, that's before you get to the door.
Q. Before you get to the door?
A. Yeah, that's in the hallway.
Q. All right. And you would announce your presence when you came in?
A. Yeah.
Q. Were there ever occasions that you would announce your presence and Mr. Jackson would be in the room?
A. Yeah.
Q. Were there ever occasions where you would announce your presence and he wasn't there?
A. Yeah.
Q. Did you try to go to his room when he wasn't there to clean?
A. When he was there? When he wasn't?
Q. Yeah, what did you try to do, what was your preference? To clean while he was there, or to clean while he wasn't there?
A. I'll -- well, sometimes he'll be there and I'll be cleaning.
Q. Uh-huh.
A. It didn't matter.
Q. Okay. Where was his bed, incidentally, at 4991

1 that time? Where did he sleep?
2 A. As soon as you came into the bedroom, that's
3 his bed.
4 Q. So his bed was downstairs?
5 A. Yes.
6 Q. Was there another bed upstairs?
7 A. Yes.
8 Q. Which bed did he sleep in?
9 A. Downstairs.
10 Q. And you would make --
11 A. Most of the --
12 Q. And you would make that bed; is that right?
13 A. Yes.
14 Q. All right. Did he ever have visitors over
15 at his home?
16 A. Yeah.
17 Q. Visitors who stayed?
18 A. Excuse me?
19 Q. Visitors who stayed for periods of time?
20 A. Yes.
21 Q. Did you know a person by the name of Wade
22 Robeson?
23 A. Yeah.
24 Q. Who was Wade Robeson?
25 A. He was a young kid, a young little boy.
26 Q. How old was Wade Robeson when you first met
27 him?
28 A. Probably eight. Seven or eight. 4992

Q. Do you know where Mr. Robeson -- where Mr. Robeson - an eight-year-old - where Wade Robeson came from?
A. Yes. From a different country. I mean, from another country. Switzer --
Q. Do you know which country?
A. No, I don't remember.
Q. But you recall that it was from a different country?
A. Yeah.
Q. Was it an English-speaking country or a country with a different language?
A. Different language.
Q. Did you ever talk to Wade Robeson?
A. A little bit.
Q. Was he there with family?
A. With his mother.
Q. Do you remember --
A. I think he has a little sister. I don't remember.
Q. All right. Did Wade Robeson --
MR. MESEREAU: Objection. The prosecutor didn't let the witness finish.
MR. ZONEN: I'm sorry, I thought she had.
Q. Please go ahead, if you hadn't finished that answer.
A. Excuse me?
Q. I think you said he has a little sister? 4993

A. Yeah. I don't remember, tell you the truth.
Q. Do you have a recollection of a sister?
A. I -- you know, I don't remember, tell you the truth.
Q. Do you remember his mother?
A. His mother, yeah.
Q. Where did she stay when they were there?
A. In the guesthouse outside. They call them the guest quarters.
Q. The guest quarters?
A. Uh-huh.
Q. Do you remember if Wade Robeson's father was there?
A. No.
Q. Where did Wade Robeson stay?
A. In Mr. Jackson's room.
Q. All right. In the bedroom?
A. Yeah.
Q. For what period of time was Wade Robeson visiting Mr. Jackson?
A. Weeks.
Q. Weeks?
A. Yeah.
Q. When he would come, would he stay -- what's the longest that he would stay at any one time?
MR. MESEREAU: Objection; foundation.
THE COURT: Sustained.
MR. ZONEN: Well, let me ask a couple 4994

preliminary questions.
Q. You've already told us that you cleaned Mr.
Jackson's room.
A. Yes.
Q. Were you the only one who cleaned Mr.
Jackson's room?
A. Yes.
Q. Did you go into Mr. Jackson's room daily,
every single day, when you were working?
A. Yes.
Q. Were you working at that period of time, as
you said, at least five and sometimes six days a
week?
A. Yeah.
Q. Would you be the first one in his room in
the morning?
A. Yes.
Q. Would you have to fix his bed?
A. There were times when nobody knew that he
was going to be there, and they call me at home,
telling me, "He's here, and so you have to come and
clean up."
Q. Did you see Wade Robeson there?
A. Yeah.
Q. All right. Did you see him there for days
at a time?
A. Yeah. Yes.
Q. Did you see where he was staying? 4995

A. Yes.
Q. Okay. Where was he staying?
A. In Mr. Jackson's room.
Q. All right. Did you see Wade Robeson's belongings?
A. Yeah.
Q. What kind of belongings did he have?
A. He had clothes, little suitcase, kids' suitcase, and his clothes in there.
Q. All right. Would you wash Michael Jackson's clothing as part of your job?
A. Yeah.
Q. Did you wash Wade Robeson's clothing?
A. As well, yes.
Q. Always?
A. Yes.
Q. Whenever he was there?
A. Yes. I find them on the floor, so I'll -- I'll wash them.
Q. And his clothing was found on the floor in where?
A. Different places.
Q. Whose room?
A. Mr. Jackson's room.
Q. All right. Would you find Mr. Jackson's clothing there as well?
A. Yes.
Q. And that was your responsibility, your job, 4996

1 to simply gather up the clothing and launder it?
2 A. Yeah. Yes.
3 Q. And then return it to his room?
4 A. Uh-huh.
5 MR. MESEREAU: Objection. Leading; move to
6 strike.
7 THE COURT: It's leading; sustained.
8 Stricken.
9 Q. BY MR. ZONEN: Was there a place that --
10 where you kept Wade Robeson's clothing after you
11 laundered it?
12 A. No, I put them together with his clothes and
13 in his case, his little suitcase.
14 Q. Now, tell us how often Wade Robeson came to
15 visit.
16 I have two questions and we'll do one at a
17 time. Let me tell you both of them. How often he
18 came, and how often -- how long he stayed each time
19 he came. So let's start with the first one.
20 How often did he come, Wade Robeson?
21 MR. MESEREAU: Objection; foundation.
22 THE COURT: Overruled.
23 You may answer.
24 THE WITNESS: How often did he come?
25 Q. BY MR. ZONEN: How often did he come to
26 Neverland to visit Mr. Jackson?
27 A. Uh --
28 MR. MESEREAU: Vague as to time; objection. 4997

THE COURT: Sustained.
Q. BY MR. ZONEN: Well, tell me when he first came. You said he was eight years old. Do you remember what year that was?
Excuse me.
A. Probably --
Q. I'm sorry.
A. '99.
Q. '99 or '89?
A. '89, I mean.
Q. You quit working there when?
A. In '90 -- '91, I think. '91.
Q. '91. All right. So you think it might have been in 1989 that Mr. Robeson visited?
A. '89.
Q. Young Wade Robeson?
A. Yeah.
Q. And were you the one who was working for Mr. Jackson exclusively in his bedroom during that time?
A. Yes. One occasion I left and somebody else got in charge. The manager --
Q. Uh-huh.
A. -- got in charge of cleaning, you know, when I left for vacation.
Q. And for how long was that?
A. Probably about two weeks.
Q. All right. But for the rest of the time, 4998

you were there cleaning?
A. Yes.
Q. And during that period of time when Wade Robeson was there, were you able to see him?
A. Yes.
Q. Were you able to do his laundry?
A. Yes.
Q. Were you able to see him daily? Did you ever actually see him in Mr. Jackson's bedroom?
A. Yes.
Q. Daily?
A. (Nods head up and down.)
Q. Daily?
A. Yes.
Q. Okay. Now, you said that he first came, you think, in 1999?
A. Uh-huh yes.
Q. How many separate times? When was the last time he came? In other words, how long after the first visit was the final visit, to your knowledge?
A. I don't remember. It was, I guess, about a year, less than a year before I left.
Q. So were the visits, then, over a period of time of one year?
A. Yeah.
Q. Do you know how many separate times he came during that one-year period to visit?
A. He'll be there for weeks, and then he'll 4999

leave and come back after two weeks.
Q. And stay for how long?
A. For another week.
Q. Did he generally stay for at least a week?
A. Yes.
Q. Mr. -- Wade Robeson was there for quite some time?
A. Yes.
Q. All right. And during that time, are you aware of him staying anyplace other than Michael Jackson's bedroom?
A. No. He'll stay there as far as I know.
Q. Now, your obligation, of course, was not just to clean up, but to do the linens?
A. Yes.
Q. The sheets off the beds; is that right?
A. Change.
Q. You said that there were two beds --
A. Uh-huh, yeah.
Q. -- at least? Were there more than two beds in his suite or just two?
A. No, just two.
Q. Did you make the beds every single day?
A. Yes.
Q. During the time that Wade Robeson was there, how many beds did you make? One or more than one?
A. Just that one.
Q. The one that was Mr. Jackson's bed? 5000

A. Yeah. The one upstairs was rarely used.
Q. All of the visits when Wade Robeson came,
was his mother there for all of the visits?
A. Sometimes.
Q. Were there some times that she was not
there?
A. Yes.
Q. But Wade Robeson came by himself?
A. Yeah.
Q. Do you know how?
A. Mr. Jackson will bring him.
Q. He would bring him?
A. Yeah.
Q. And during that entire year of visits, did
you ever see Wade Robeson's father?
A. You know, that I don't remember. I --
Q. You don't have a picture of him in your
mind?
A. No.
MR. MESEREAU: Objection. Leading; move to
strike.
THE COURT: Sustained. It's stricken.
Q. BY MR. ZONEN: Do you have a picture of him
in your mind?
A. Of the little boy?
MR. MESEREAU: Objection; asked and
answered.
THE COURT: The objection is overruled. But 5001

she's asked for clarification.
MR. ZONEN: Let me change the question, if I
can. I'll withdraw the question.
THE COURT: All right.
Q. BY MR. ZONEN: Can you describe Wade
Robeson's father to us?
A. No.
Q. And I think that you said that there might
have been a sister. Do you recall a sister?
A. I don't remember. So many kids there, I
don't remember.
Q. Okay. Was there ever an occasion, to your
recollection, where any other child stayed with Mr.
Jackson in his room while Wade Robeson was there?
A. No.
Q. Only Wade Robeson?
A. Yes.
Q. All right. Was there ever an occasion where
you walked into his room and you saw some kind of a
separate sleeping arrangement, what you believe to
be a separate sleeping arrangement for Wade Robeson?
MR. MESEREAU: Objection. Vague; leading;
foundation.
THE COURT: I'll sustain vague.
Q. BY MR. ZONEN: Did you ever see a sleeping
bag on the floor?
A. No.
Q. Did you ever see anything that causes you to 5002

1 believe that Wade Robeson was sleeping someplace
2 other than in Michael Jackson's bed?
3 A. No.
4 Q. Was there an occasion that you went into
5 Michael Jackson's room and came upon Michael Jackson
6 and Wade Robeson?
7 MR. MESEREAU: Objection; leading.
8 THE COURT: Overruled.
9 You may answer.
10 THE WITNESS: Did I what?
11 Q. BY MR. ZONEN: Come into Michael Jackson's
12 room and discover that Michael Jackson was there
13 with Wade Robeson.
14 A. Yeah.
15 Q. Okay. Was there an occasion when you went
16 in and they were in the shower?
17 MR. MESEREAU: Objection; leading.
18 THE COURT: Sustained.
19 Q. BY MR. ZONEN: Did you ever come in and find
20 them in a situation that made you uncomfortable?
21 MR. MESEREAU: Objection; leading.
22 THE COURT: Overruled.
23 Q. BY MR. ZONEN: Do you understand what I'm
24 asking?
25 A. That I was what?
26 Q. Where you were uncomfortable. You found
27 them and you were uncomfortable.
28 MR. MESEREAU: Objection; leading. 5003

THE COURT: Overruled.
You may answer.
THE WITNESS: Well, I came one time and -- in the bedroom.
MR. ZONEN: Uh-huh.
THE WITNESS: And first I thought they were playing.
MR. MESEREAU: Objection.
THE WITNESS: And --
MR. MESEREAU: Nonresponsive.
THE COURT: Sustained.
Q. BY MR. ZONEN: All right. The question was "yes" or "no."
A. Yes.
Q. Okay. Tell us what you heard when you first walked into the room.
A. Laughing.
Q. Okay.
A. And playing; like playing around.
Q. Okay. What did you do?
A. I came in, and I -- first I thought that they were playing in the bathtub, Jacuzzi, and I didn't see them. And then I thought they were outside, playing outside the house; I mean, in his garden. And I walked and they were in the shower.
Q. You have to explain to us a little bit the layout here.
A. Uh-huh. 5004

Q. Is there a Jacuzzi inside his house, inside his bedroom?
A. Inside his bedroom, yeah.
Q. So explain that for us. Describe to us what you get to first. The shower? The Jacuzzi? Explain how it's laid out.
A. First, you get to the bed. And then you get in the bathroom, they call it the ladies' bathroom, and there's a big Jacuzzi there.
Q. Okay. Was there a door that goes to that bathroom?
A. Yeah.
Q. Was the door open or was the door closed?
A. No, the door is open. It was open.
Q. And what did -- did you look into that door?
A. Which door?
Q. The door that goes to the bathroom.
A. Well, I have to go through there.
Q. Okay.
A. Yeah.
Q. What do you mean, you have to go through there?
A. To get to the bathroom.
Q. And did you do that?
A. Yeah.
Q. What did you see?
A. And then I was going to walk outside to the garden, but then -- 5005

Q. Okay.
A. -- on my way going, I peek, and it was in the shower.
Q. And what did you see?
A. And I hear this playing around. That's where he was taking a shower, I guess.
Q. Okay.
A. With little Wade.
Q. What did you see? Tell me what you saw.
A. I -- what I saw, I -- just some clothes on the floor.
Q. You saw clothes on the floor in the bathroom or in the bedroom?
A. No, in the shower.
Q. In --
A. By the shower.
Q. By the shower. What clothing did you see on the floor?
A. Underwear.
Q. Underwear?
A. (Nods head up and down.)
Q. More than one pair?
A. Yeah.
MR. MESEREAU: Objection; leading.
THE COURT: Overruled. Next question.
Q. BY MR. ZONEN: How many pair did you see?
A. Two.
Q. Two pair of underwear? 5006

A. Yeah.
Q. Did you recognize the underwear?
A. Yeah.
Q. And how did you happen to recognize the underwear?
A. The -- Mr. Jackson's, I knew they were white. And the little boy, they were colored.
Q. All right.
A. They were little underwear.
Q. Can you describe the little boy's underwear?
A. They were little green underwear.
Q. Green underwear?
A. Uh-huh. Had like a neon color.
Q. Neon green?
A. Yeah.
Q. Just in case he lost them? You did his underwear previously, didn't you? You had washed his underwear previously?
A. Uh-huh.
Q. Did you know Wade Robeson's underwear?
A. Yeah.
Q. Okay.
A. They have little, you know, characters, like Spiderman and things like that.
Q. Child's?
A. Child's.
Q. A small child's underwear?
A. Yeah. 5007

Q. And Mr. Jackson's underwear you washed regularly as well?
A. Yeah.
Q. And his underwear was what type?
A. I don't know. I think they call them briefs.
Q. And what color?
A. White.
Q. Okay. You say you found two pair. Where were they?
A. On the floor.
Q. Okay. And on the floor in the bathroom?
A. Yeah.
Q. Now, how far is the underwear from either the Jacuzzi or the shower?
A. Well, they're right by -- they were right by the door, by the shower.
Q. Okay. Was water running?
A. Yeah.
Q. Excuse me. And the water was running in the -- in the shower?
A. Yes.
Q. Did you -- did you know that, that the water was running, when you first came into his bedroom suite?
A. Well, I heard the radio, and then eventually I hear the water going.
Q. I'm sorry, I heard the first part. 5008

A. The radio. I heard the radio.
Q. You heard the radio?
A. Yeah, playing. And then eventually I hear the water going.
Q. And then you heard the water?
A. Yeah, because I hear two people, you know, playing.
Q. And you say you heard two people playing. What were the sounds that you heard?
MR. MESEREAU: Objection; asked and answered.
THE COURT: Sustained.
Q. BY MR. ZONEN: Did you hear two voices?
A. Yeah.
MR. MESEREAU: Objection; asked and answered.
THE COURT: Leading; sustained.
Q. BY MR. ZONEN: For what period of time did you hear sounds?
A. Maybe about a minute.
Q. Did you recognize the voices that you heard?
A. Yeah.
Q. Whose voices were they?
A. Mr. Jackson.
Q. Did you recognize the second voice?
A. Yeah.
Q. Whose voice was that?
A. The little kid, the -- 5009

Q. Wade?
A. Wade's, little boy.
Q. When you finally reached a spot where you could see in, was your vision obscured by anything?
MR. MESEREAU: Objection. Leading; assumes facts not in evidence.
MR. ZONEN: Withdraw the evidence -- withdraw the question.
Q. In that bathroom, is there a shower curtain?
A. No.
Q. What is there in that bathroom?
A. A glass door.
Q. A glass door. Is it a glass door that is fogged or is it a glass door that is clear?
A. It's clear, but at that time it was smoky.
Q. Okay. Smoky?
A. Cloudy.
Q. Cloudy? From the shower?
A. Yeah.
Q. All right. When there's no shower going, can you see through the glass?
A. Yeah.
Q. On this occasion when the shower was going, could you see through the glass?
A. No.
Q. Could you see any figure at all? What could you see?
MR. MESEREAU: Asked and answered. 5010

THE WITNESS: I saw a figure.
MR. ZONEN: Hold on.
THE COURT: Just a minute.
The objection is overruled. “I saw a figure” is the answer. Go ahead.
Q. BY MR. ZONEN: Did you see more than one figure?
A. Yeah.
Q. All right. Did you recognize either of the figures that you saw?
A. Mr. Jackson.
Q. All right.
A. And the little kid.
Q. Was one figure larger than the other?
A. Yeah.
Q. Was the second figure the size of Wade Robeson?
A. Yeah. Yes.
Q. What did you do at that point?
A. That he was going to get mad, or --
MR. MESEREAU: Objection; nonresponsive.
THE COURT: Sustained.
MR. MESEREAU: Move to strike.
Q. BY MR. ZONEN: What did you do at the time that you saw Mr. Jackson and Wade Robeson in the shower? What did you do then?
A. I was going to talk to them, but then I thought, “No, I better not,” so I just went back. 5011

Q. Did you leave the room?
A. I -- yeah, I left the room.
Q. Did you tell Mr. Jackson that you had been in the room?
A. No.
Q. Did you back into the room at a later time?
A. Yeah, to clean the room.
Q. Miss Francia, was there ever an occasion where you saw your son Jason with Mr. Jackson and you were concerned?
MR. MESEREAU: Objection; leading.
THE COURT: Overruled.
You may answer.
Q. BY MR. ZONEN: Go ahead.
A. I was concerned for my son, yes.
Q. Can you tell us when that happened?
A. The first time, it was -- I think it was in Encino.
Q. Okay.
A. That I remember that I walked in, because I had the key to that room, too.
MR. MESEREAU: Objection. Nonresponsive; move to strike.
THE WITNESS: And I walked in --
THE COURT: Wait. Just a moment, please.
All right. No question was pending, so I'll strike her answer.
Q. BY MR. ZONEN: All right. It was in Encino. 5012

Do you remember when that was?
A. Do you mean the date?
Q. Or the year.
A. Probably ‘86. I don’t remember.
Q. Okay. How old was Jason?
A. Probably about seven or eight, probably.
Seven.
Q. Seven. And what did you see that concerned you?
A. Well, I saw little things before that with other kids, and --
MR. MESEREAU: Objection; nonresponsive.
Q. BY MR. ZONEN: Just tell us what you saw --
THE COURT: Sustained.
Q. BY MR. ZONEN: Just tell us what you saw with Jason.
A. Well, he was sitting on his lap.
Q. Okay. And what concerned you?
A. And I walked in, and he was sitting on his lap, and Mr. Jackson was just reclining, reclining to the back.
Q. Reclining?
A. Reclining to the back.
Q. Okay.
A. And having my son in his lap.
Q. And where was Jason positioned on his lap?
A. His legs.
Q. Okay. And what did you do? 5013

A. I just told my son to get out. And he was -- I remember he say, “No, I’m fine.”
MR. MESEREAU: Objection. Nonresponsive; move to strike.
Q. BY MR. ZONEN: You told your son to get out?
THE COURT: Just a moment.
Stricken.
Q. BY MR. ZONEN: You told your son to get out?
A. Yeah.
Q. Did he do so?
A. No.
Q. What did you do then?
A. I think I push him, and -- oh, he was -- some kind of -- reading a book or coloring. And Mr. Jackson say, “I want him to read,” or “I’m reading a story,” something like that.
Q. Did you take your son off of his lap?
A. Yeah. Yes.
Q. Was there another occasion that you were concerned?
MR. MESEREAU: Objection; leading.
THE COURT: Overruled.
Q. BY MR. ZONEN: You can answer.
A. Yeah, I remember one time, too, at the Encino house that I want my son to stay downstairs, because he -- he will come and -- Mr. Jackson will come and, you know, probably wanted to be by himself, and I said, “You stay here,” and I -- 5014

Q. You said that to who?
A. To my son, you know, to “Stay here. Stay here, because Michael is here, and,” you know, “he probably want to be by himself.”
And then he find out -- I guess Mr. Jackson find out that my son was there, and so he took him upstairs.
And I got mad, because my -- I told my son not to go with him, but I got concerned because my son --
MR. MESEREAU: Objection. Nonresponsive; move to strike.
THE COURT: I’ll strike the last sentence.
Q. BY MR. ZONEN: Did you go look for your son?
A. No.
Q. When did you next see your son?
A. What do you mean?
Q. On that day, on that occasion.
A. Oh. Well, I -- I did my cleaning, or whatever I was doing, and after, he came -- he came down.
Q. Okay. Let me ask you about the hideout. At the hideout, you had mentioned that there wasn’t a bed. What did Mr. Jackson sleep in?
A. He sleeps in a sleeping bag.
Q. All right. The whole time that he was at the hideout?
A. Yeah. There was no bed. 5015

Q. I'm sorry?
A. There was no bed there.
Q. Was there ever an occasion that you and your son stayed the night at the hideout?
A. No.
Q. You always left at the end of the day?
A. Yeah.
Q. And did you have an apartment that was someplace in Los Angeles at that time?
A. He?
Q. You.
A. Oh, yeah, I did.
Q. So during the time that you were going to the hideout regularly --
A. Yeah.
Q. -- you had an apartment.
And I think that you had testified that even after you moved to Santa Maria, there were still occasions that you went back to clean at the hideout?
A. Many times, yeah.
Q. Do you know for approximately how long after you moved to Santa Maria?
A. Probably a year.
Q. Okay. Now, what did he -- I asked you what he slept on, and you said a sleeping bag. Describe the sleeping bag for us. What kind of a sleeping bag was it? 5016

A. A regular sleeping bag that you sleep on.
Q. Sleeping bag for one person? For two people? How big?
A. A regular one.
Q. Just a regular sleeping bag?
A. Yeah.
Q. Was that sleeping bag always open, or was it rolled up?
A. It was open.
Q. Always?
A. Well, when I made it, I would try to make it like a bed, you know.
Q. Were there any blankets on the sleeping bag or under the sleeping bag?
A. Yeah, there were blankets.
Q. Which? On the sleeping bag or --
A. On the sleeping bag, yes.
Q. Was the sleeping bag simply on the floor?
A. Yeah.
Q. Was there carpet on the floor?
A. Yes.
Q. Did you ever see Jason on or in the sleeping bag?
A. One time.
Q. Was Mr. Jackson there?
A. Yes.
Q. Were they on the sleeping bag or were they in the sleeping bag? 5017

A. They were on the sleeping bag, yeah.
Q. On top of the sleeping bag?
A. Yeah.
Q. Could you see their body -- bodies, both of them?
A. Not Mr. Jackson's.
Q. Why not?
A. Because it was covered.
Q. Okay. So the sleeping bag covered Mr. Jackson?
A. Yeah.
Q. How about Jason? Where was Jason?
A. He was in the sleeping bag, too.
Q. He was in the sleeping bag. How were they positioned relative to each other? Do you know what I mean? Were they facing each other? Were they facing away from each other? Do you recall?
A. I remember this time he was this -- on this side, and my son was on this side. And I got there about three or four times, and one time he was -- my son was --
MR. MESEREAU: Objection; nonresponsive.
THE COURT: It's kind of hard to tell. Maybe you could start with another question.
MR. ZONEN: Yes, I can.
Q. I asked you initially how they were positioned. In other words, were they facing each 5018

other? Were they facing away from each other? Do you recall? When you saw them the first time.
A. The first time, my son was just laying there.
Q. Okay.
A. But on one time, because I was cooking for Mr. Jackson, I was doing some lunch, or snacks, or something --
Q. I'm sorry?
A. I was cooking some snacks.
Q. Snacks. Okay.
A. Popcorn.
Q. Okay.
A. I don't remember.
Q. Are we still talking about the same event, the same day?
A. Yes.
Q. Okay. So when --
A. Hmm?
Q. When you first saw your son in the sleeping bag with Mr. Jackson, did you say anything to your son at all when you first saw him in the sleeping bag?
A. I told him to come up, outside, and eat, because I wanted to feed him.
Q. Okay. And did he?
A. No.
Q. All right. What did you do? 5019

A. He say, “I want to stay here.”
Q. Okay. What did you do?
A. And -- well, I got mad. And I said, you know, “You got to get out to the kitchen,” and he didn’t wanted to.
Q. All right. Were you speaking with him in English or in Spanish at that time; do you recall?
A. No, I don’t remember.
Q. Do you know what language -- what language do you speak with your son now?
A. Spanish.
Q. You speak Spanish?
A. Yeah.
Q. You’ve always spoke Spanish with him?
A. Yeah.
Q. His wife does or does not speak Spanish?
A. No.
Q. In her presence, what do you speak?
A. English.
Q. Okay. But he grew up speaking Spanish?
A. Yes.
Q. And he’s very fluent in Spanish?
A. Yes.
Q. When you asked him to come out to go eat, in what language was that?
A. I think I said it in Spanish. But then I want Mr. Jackson to understand what I was telling him to do, and so I guess I said it in Spanish and 5020

1 English. I don't remember.
2 Q. So you're not certain at this point?
3 A. No.
4 Q. All right. Did he get out of the sleeping
5 bag?
6 A. No.
7 Q. What did you then do? Did you leave the
8 room or --
9 A. I left the room and I proceed to do my stuff
10 and --
11 Q. Okay. And what happened then?
12 A. Then I went back and -- and then he was
13 eating, but he was -- oh, I took something to eat to
14 him.
15 Q. Okay. When you came back out, was he still
16 in the sleeping bag with Mr. Jackson?
17 A. Yeah.
18 Q. What were they doing in the sleeping bag? I
19 don't mean in the sleeping bag, but what were they
20 doing in the room?
21 A. They were watching T.V.
22 MR. MESEREAU: Objection; foundation.
23 THE COURT: A time frame?
24 MR. MESEREAU: Yes.
25 THE COURT: Sustained.
26 Q. BY MR. ZONEN: At the time that you first
27 came into that room, was the television on?
28 A. On, yes. 5021

Q. Do you remember approximately what time of the day it was?
A. Probably was about 2:00, 1:00 or 2:00 in the afternoon.
Q. Was the room light or was the room dark?
A. It was dark. It gets really dark.
Q. But this was about 1:00 or 2:00 in the afternoon?
A. Yeah.
Q. Were there shades on the windows?
A. Draperies, curtains.
Q. Draperies. And were they drawn? Were they closed?
A. Closed.
Q. So the light was not in?
A. No.
Q. Do you remember what they were watching on television?
A. No.
Q. Do you know what Jason used to like to watch at that time?
MR. MESEREAU: Objection; relevance.
THE WITNESS: At that time --
MR. ZONEN: I'll withdraw the question.
THE COURT: All right.
Q. BY MR. ZONEN: How old was Jason, to your recollection, at that time, as best you can recall?
A. Probably like eight. Probably eight. That 5022

1 was --
2 Q. I'm sorry, go ahead.
3 A. -- before we move here to Santa -- to --
4 before he moved here to Neverland.
5 Q. It was before he moved to Neverland?
6 A. Yeah.
7 Q. And Jason was born on, if I'm not mistaken,
8 May 30, 1980?
9 A. Yes.
10 Q. Is that his birth date?
11 A. Yes.
12 Q. When you moved to Neverland in 1988, he
13 would have been about eight years old?
14 A. Yeah.
15 Q. And you believe this was before?
16 A. Oh, yeah. Yeah.
17 Q. Okay. Do you know if Mr. Jackson ever gave
18 Jason money?
19 A. Yeah.
20 Q. Do you know on how many occasions?
21 A. That I remember, because it was -- to me, it
22 was a lot of money for a little kid. At the hideout
23 he gave him some money.
24 Q. Do you know how much money he gave him?
25 A. From what I remember, it was two
26 hundred-dollar bills.
27 Q. Two 100-dollar bills?
28 A. Two 100-dollar bills, yes. 5023

Q. When did you first see that money?
A. After -- what happened was that I left the key at his apartment. And we were walking to get -- take the bus home, back home. My car key, I left it there. And we were going to walk to -- to the bus stop.
Q. Okay. Were you taking the bus back and forth?
A. No, I was driving. But I left the key, my car key there, and I didn't want to go back and knock at the door, because --
Q. You didn't have your key?
A. Yeah, Mr. Jackson wouldn't open the door.
Q. Okay.
A. So I remember we were walking to the bus stop, and he say -- my son told me he has money --
MR. MESEREAU: Objection.
THE WITNESS: -- in his pocket.
MR. MESEREAU: Nonresponsive.
THE COURT: Just a moment.
True, there's no question pending. It's nonresponsive.
MR. ZONEN: All right.
Q. Where were you when you first saw the money?
A. At the bus stop.
Q. Okay. Did he give you the money, your son?
A. No.
Q. All right. How did you see the money? 5024

A. Well, he say he had lots of money and that it was a secret.
Q. Okay. What did you say?
A. And I say, “What do you mean, a secret? How much money?” But I thought it was maybe two dollars.
MR. MESEREAU: Objection; hearsay.
MR. ZONEN: Spontaneous declaration, Your Honor.
THE COURT: I’m going to allow the answer to the question of, “What did you say?” which I think is the objection you were making.
MR. MESEREAU: Has to do with third-party statements, Your Honor.
MR. ZONEN: I’m sorry.
THE COURT: I’m going to ask you to rephrase the question. The question you last asked where the objection came was, “And what did you say?” And she did say what she said. But then she was going to say something else.
MR. ZONEN: Yes. Thank you.
Q. What did your son say to you in response to your statement?
MR. MESEREAU: Objection; hearsay.
MR. ZONEN: That’s a spontaneous declaration.
THE COURT: Okay.
MR. ZONEN: That’s what I originally meant. 5025

THE COURT: I will allow it on that basis.
MR. ZONEN: Thank you, Your Honor.
Q. What did your son say?
A. That he has the money; that it was a secret;
he wasn't going to tell me.
Q. Okay.
A. But at this point I thought it was maybe two
dollars or a dollar.
Q. Did you ask to see it?
A. And I say, "I want to see it." And he say,
"No, because Michael told me that it's for me and
not to tell you." But like I say, I thought it was
two dollars. I say, "How much is it?"
And I pull it out of his pocket.
Q. It was in his pocket?
A. It was in his pocket. He said he put --
Q. Do you remember what he was wearing?
A. Pants.
Q. You believe it was pants?
A. Yeah. He says, "He put it in my pocket.
Don't take it out."
So I pull it out, and I said, "$200?"
MR. MESEREAU: Objection; nonresponsive.
THE COURT: Sustained.
Q. BY MR. ZONEN: Did you reach into his
pocket?
A. Yeah.
Q. Did you retrieve it? 5026

A. Yeah.
Q. What was it?
A. It was two 100-dollar bills.
Q. Were there ever other occasions that you were aware of where Mr. Jackson gave your son money?
A. No.
Q. Was that the only occasion that you recall?
MR. MESEREAU: Objection; asked and answered.
THE COURT: Sustained.
Q. BY MR. ZONEN: Did you ever see your son with money on other occasions?
A. I'll give him allowances. And, you know, he'll keep it -- you know, a dollar or two.
Q. Do you know who Macaulay Culkin is?
A. Yes.
Q. Who is Macaulay Culkin?
A. The little kid from the movies.
Q. Yes. Did you ever see Macaulay Culkin --
A. Yes.
Q. -- personally? Where did you see him?
A. At the Neverland. At the ranch.
Q. Did he visit Neverland?
A. Yes.
Q. How often did he visit Neverland?
A. I don't remember. But it was a few times when I was there. 5027

Q. More than once?
A. Yes.
Q. Over what period of time, from the first time to the last time?
A. Probably six months.
Q. Were you working that entire time?
A. Yes.
Q. Were you working in the same job you've already described for us, as Mr. Jackson's personal maid?
A. Yes.
Q. Were you cleaning his room?
A. Uh-huh. Yes.
Q. And doing his laundry?
A. Yes.
Q. When Mr. Culkin came -- well, it was Macaulay Culkin. How old was he when you first saw him, approximately?
A. I think about eight or nine. Probably eight.
Q. Was this before or after Wade Robeson was visiting?
A. After.
Q. Did they ever visit at the same time?
A. No. Not that I can remember.
Q. Did Wade Robeson continue to visit during the time that Macaulay Culkin was coming?
A. I don't remember. 5028

Q. Do you know where Macaulay Culkin stayed when he came to Neverland?
A. With Mr. Jackson.
Q. Did Macaulay Culkin come with any other family members that you recall?
A. Yeah, I remember him with his father and mother.
Q. Father and mother?
A. And the other kids.
Q. Other --
A. Brothers and sisters.
Q. Other siblings?
A. Yes.
Q. Do you know how many siblings he had, whether they were boys or girls?
A. No, I don’t remember.
Q. Do you know if it was more than one other sibling?
A. Yeah. More than one.
Q. Did he have at least one brother and one sister at least?
A. Yes.
Q. Do you know the total number of brothers and sisters?
A. No. No. Probably five. I don’t remember.
Q. I asked you where Macaulay Culkin stayed, and you said with Mr. Jackson. How do you know that? 5029

A. Because I'll go to his bedroom and clean up after.
Q. Did you ever see Macaulay Culkin in Mr. Jackson's bedroom?
A. Yes.
Q. Were his possessions there in the bedroom?
A. Yeah. I don't remember.
Q. That you don't recall?
A. No.
Q. Do you recall if you ever washed his clothing as you did Wade Robeson's?
A. Yeah.
Q. Would you have washed his clothing if his clothing was someplace other than his bedroom?
MR. MESEREAU: Objection; calls for speculation.
THE COURT: Sustained.
Q. BY MR. ZONEN: Was it your responsibility to wash clothing from rooms other than Mr. Jackson's bedroom?
A. No.
Q. If guests did not stay with Mr. Jackson, where would they have stayed?
A. In the guest rooms. They call them the outside guest rooms. You know, they're like four -- four guest rooms outside.
MR. ZONEN: Could I have those photographs, please? Oh. Thank you. 5030

I'm sorry, did you say something?
MR. MESEREAU: I'm going to object as
cumulative.
MR. ZONEN: Oh, okay. All right.
Q. And I think that you said it was for a
number of months that Macaulay Culkin stayed?
A. Yeah. Weeks.
Q. I don't mean continuously. But what do you
think was the longest period that you ever saw him
there during that few-month period of time?
A. About a week.
Q. Okay. Do you know if he always came with
his family?
A. Not always.
Q. How else did he come?
A. How often?
Q. How else, if he was not with his family?
Was he with other people?
A. No.
Q. Did he come by himself?
A. Yes.
Q. Do you have a recollection of how many times
Macaulay Culkin came to visit Neverland by himself?
A. Maybe I remember about two times.
Q. All right. How old was Jason during the
time that Macaulay Culkin was there?
A. At that time he was probably already ten.
Q. Jason was older than Macaulay Culkin? 5031

A. Yeah.
Q. About how much older?
A. Probably a year or two. I don't know.
Q. During the time that Macaulay Culkin stayed in Mr. Jackson's bedroom, do you know if other members of his family also stayed in the bedroom with them?
A. Yeah, I think they did.
Q. On every occasion?
A. Not all the time.
Q. Are you aware --
A. When --
Q. I'm sorry, go ahead.
A. When he was by himself, he was there by himself with Mr. Jackson.
Q. Do you know of any occasions when Macaulay Culkin came to visit when he did not stay in Mr. Jackson's room?
A. No.
Q. And on those occasions when Macaulay Culkin stayed in Mr. Jackson's room, do you know if there was ever a separate sleeping arrangement, in other words, a separate bed or a separate sleeping bag that you would have to clean up?
A. No.
Q. Excuse me, I'm sorry.
Why did you leave Neverland, your employment at Neverland? 5032

MR. MESEREAU: Objection; relevance.
THE COURT: Sustained.
Q. BY MR. ZONEN: Did you leave your employment at Neverland?
A. Yes.
Q. Okay. Did you leave of your own volition?
A. Yes.
Q. Do you remember when it was you left Neverland?
A. May, I think.
Q. Of what year?
A. '91. '90 or '91. '91, I think.
Q. May of '91?
A. '91.
Q. All right. So you would have been employed by Mr. Jackson for a period of about five years?
A. Five years, yeah.
Q. Now, May of '91 your son would be turning 11; is that right?
A. Yes.
Q. Do you know if you left before his 11th birthday?
A. Uh-huh. About.
Q. Did your son have any more association with Michael Jackson after you?
A. After?
Q. Yes, after you left.
A. No.

Q. Did you ever go back to Neverland after you left?
A. No.
Q. Did you ever visit with Mr. Jackson after you left?
A. No.
Q. Were you contacted by law enforcement at some time after you left Neverland, your employment at Neverland, for an interview?
A. Yeah. 1994 or '93. I don't remember.
Q. '93 or '94? So it was already some time after you left Neverland; is that right?
A. Yes.
Q. At least a year, and probably two?
MR. MESEREAU: Objection; leading.
MR. ZONEN: Let me withdraw the question.
Q. How long after you left your employment at Neverland was it that law enforcement contacted you?
A. About two and a half years.
Q. Did you contact them or did they contact you?
A. They came to me.
Q. At the time they contacted you, did you know whether or not there was an investigation going on involving Mr. Jackson?
A. Yeah. Yes. I was -- kind of.
Q. Were you expecting to be contacted?
MR. MESEREAU: Objection. Calls for 5034

speculation; relevance; foundation.
MR. ZONEN: Goes to her state of mind.
THE COURT: Sustained.
Q. BY MR. ZONEN: All right. Did it come as a
surprise to you when you were contacted?
MR. MESEREAU: Objection. Relevance;
foundation; leading.
THE COURT: And I'm going to back up a minute
and change my ruling on the question, "Were you
expecting to be contacted?" She may answer that
"yes" or "no." I'll overrule the last objection.
Q. BY MR. ZONEN: Did you understand that? You
may answer the question, "Were you expecting to be
contacted?"
A. Yes and no.
Q. Did you ultimately give an interview with
the sheriff's office?
A. Yes.
Q. At some point in time were you called to
give a deposition? Were you subpoenaed to give a
deposition?
A. I was subpoenaed, yeah.
Q. All right. Now, do you know who it was who
subpoenaed you to give a deposition?
A. Mr. Feldman.
Q. Was that Larry Feldman?
A. Yes.
Q. Do you know who Larry Feldman represented at 5035

1 that time?
2 A. Yeah. Another little boy.
3 Q. I'm sorry?
4 A. Another little boy.
5 Q. Do you know that person's name?
6 A. The -- the little boy?
7 Q. Yes, that he represented.
8 A. At that time I didn't know. Now -- now I
9 hear --
10 Q. What do you know the name to be?
11 A. Chandler. Chandler. Something like that.
12 But I don't know. I don't know the first name.
13 Q. Did you know that child, Mr. Chandler?
14 A. No. No.
15 Q. "Mr." You don't know how old he was? You
16 don't know how old he was?
17 A. No.
18 Q. Did you know his first name?
19 A. No.
20 Q. Was this a child you were ever introduced to
21 during the time that you were at Neverland?
22 A. No.
23 Q. And tell us what a deposition is. Having
24 gone through one, what is it?
25 MR. MESEREAU: Objection; foundation.
26 MR. ZONEN: Well, let me withdraw that.
27 Q. Did you, in fact, go through a deposition?
28 A. Did I went through -- 5036

Q. Did you have a deposition? Did they take your deposition?
A. Yeah. Yes.
Q. Okay. And did you, in fact, give testimony in that deposition?
A. Yes.
Q. Now, I asked you who it was who subpoenaed you, and you said it was Larry Feldman.
A. Uh-huh.
Q. Were there other lawyers in the room asking you questions as well?
A. Yes.
Q. Who were the other lawyers? Do you remember any of their names?
A. I remember Johnnie Cochran, and there were about five or six.
Q. About five or six lawyers?
A. Yeah.
Q. All in the room at one time?
A. Yeah.
Q. And was Johnnie Cochran asking you questions?
A. Yes.
Q. Were other lawyers asking you questions as well?
A. I don’t remember. But I think there was one “Waysman” or “Wiseman.”
Q. Weitzman? Perhaps Howard Weitzman? 5037

A. I don’t remember his last name. I mean --
Q. Do you know on which side Mr. Weitzman was?
A. With Mr. Cochran.
Q. He was with Mr. Cochran?
A. They were the two together, yeah.
Q. Who did Mr. Cochran and Mr. Weitzman represent?
A. Mr. Jackson.
Q. Okay. Was Mr. Jackson present during that deposition?
A. No.
Q. Was he ever there during the deposition at any time?
A. No.
Q. Did that deposition go longer than one day?
A. Yeah.
Q. How many days did it go?
A. Two days.
Q. Do you know how many hours each day you were deposed?
A. No.
Q. Do you know if there were other lawyers sitting with Mr. Feldman, Larry Feldman, in other words, on his side, other than Mr. Feldman?
A. No.
Q. Was Mr. Feldman the only one asking you questions from that side?
A. Yes. 5038

Q. Have you ever reviewed the transcript of that deposition?
A. No.
Q. Even back then?
A. Not that I remember.
Q. Do you remember what year it was, of that deposition?
A. ‘94, I think. Or ‘95.
Q. Was it before or after you had your first interview with law enforcement? Do you recall?
A. After.
Q. It was after? Do you remember approximately how long after?
A. No, I don’t remember the date or --
Q. Miss Francia, when you had this deposition that went on for two days, and you say that there were lawyers, a number of them in the room, did you have a lawyer with you?
A. No.
Q. Had you retained a lawyer at that time?
A. Not at that time, no.
Q. Did you give answers to questions that were put to you at that time.
A. Did I answer?
Q. Yes.
A. Yes.
Q. Did you -- did they explain to you that a deposition is the same thing as testifying? 5039

MR. MESEREAU: Objection; leading.
THE COURT: Just a moment.
MR. ZONEN: I'll withdraw the question.
THE COURT: Overrruled.
MR. ZONEN: I won't withdraw the question.
THE COURT: You may answer.
Q. BY MR. ZONEN: Did they explain to you that a deposition was the same thing as testifying?
A. No.
Q. Did you have to raise your hand to take an oath to tell the truth?
A. Oh, yeah.
Q. And you did do that?
A. Yeah.
Q. All right. Did they ask you questions about -- questions similar to the questions I've asked you so far since you've been on the witness stand?
A. (Nods head up and down.)
Q. You have to answer out loud, if you would, please.
A. Yes.
Q. All right. Did they ask you about Wade Robeson?
A. Yes.
Q. Did they ask you if in fact you had seen them in the shower together?
A. Yes. 5040

Q. Do you remember the answers that you gave to those questions?
A. Kind of.
Q. Did you tell one of the attorneys that you did not see Wade Robeson in the shower?
A. Yeah, I probably did.
Q. All right. Was that accurate?
A. Well, at that time I guess I was tired and nervous, I guess.
Q. Did you tell them that you believed Wade Robeson was in the shower?
A. Yes, I told them that.
Q. Did you tell them about the underwear?
A. Yeah.
Q. Did you tell them about hearing the voices?
A. Yes.
Q. Did you tell them about the music?
A. Yes.
Q. Did you do an interview for Hard Copy?
A. Yes.
Q. What is Hard Copy?
A. A program.
Q. A program?
A. Yeah.
Q. A program on what? On television?
A. On television, yeah.
Q. Was that a program that you had seen before that interview? 5041

A. No.
Q. Had you ever watched Hard Copy before?
A. No.
Q. Do you know what kind of -- did you know --
before you were on it, did you know what kind of a
program it was?
A. No.
Q. Were you -- did somebody contact you from
Hard Copy?
A. Yeah.
Q. And do you remember who that was who
contacted you?
A. That -- the lady who interview me.
Q. Okay. Do you happen to remember her name?
A. Yeah.
Q. What was her name?
A. Diane Dimond.
Q. Diane Dimond. Did you discuss with Miss
Dimond what it was she wanted to talk with you
about?
A. Yeah, we kind of talk about it.
Q. Okay. Did you agree to go on television?
A. Yeah.
Q. Was there some discussion with Miss Dimond
about whether or not you would be paid or
compensated for appearing on television?
A. Yeah. My friend and I went together.
Q. You went with a friend? 5042

A. Yeah.
Q. Who was your friend?
A. One of -- one of the workers at Neverland.
Q. One of the workers at Neverland?
A. Yeah.
Q. What was her name?
A. Evangeline.
Q. Evangeline?
A. Yes.
Q. And what did she do at Neverland?
A. She was a housekeeper and a cook.
Q. A housekeeper and a cook?
A. And a cook, yeah. And she helped the cook.
Q. Okay. And you were talking with Diane Dimond with Evangeline?
A. Yeah.
Q. All right. Why is that? Why was Evangeline there, or Vangie, was why she there?
MR. MESEREAU: Objection; foundation.
THE COURT: I'm not sure what you're looking for, foundation.
MR. MESEREAU: And speculation.
THE COURT: Okay.
MR. ZONEN: I'll withdraw that, then. I understand that objection.
Q. Did you ask Evangeline to be there with you?
A. She was the one who contact, I believe, Diane Dimond. 5043

Q. Did she -- she's the one who introduced you to Diane Dimond?
A. Yeah, she was the one who told me, you know, that she can get everything arranged.
Q. Okay. That she could arrange the interview?
A. The interview, yeah.
Q. And payment as well?
A. Yeah. She say, "I'll help you."
Q. What did you understand the interview to be about? What did they want to ask you about?
MR. MESEREAU: Objection. Calls for speculation.
MR. ZONEN: Withdraw the question.
Q. What was your belief that you were going to be telling them?
MR. MESEREAU: Objection. Leading.
THE WITNESS: About --
THE COURT: Overruled. You may answer.
Q. BY MR. ZONEN: What was your belief that you would be telling them?
A. About me working there.
Q. Working where?
A. At Neverland.
Q. Okay. Did you think they would be asking you questions about Michael Jackson?
A. No. I mean, that -- not the way they were asking me.
Q. How much money did they represent from Hard 5044

Copy -- how much money did they represent that they would give you for an interview?
A. How much money they gave me?
Q. Yes.
A. $20,000.
Q. $20,000.
A. Yes.
Q. And what were you going to do for $20,000? What were you going to say in this interview for $20,000?
A. Well, I -- I thought that it was going to be just talking about, you know, how it was working for him and how he was.
Q. Did that seem, to you, an unusually large amount of money?
MR. MESEREAU: Objection; leading.
THE COURT: Sustained.
Q. BY MR. ZONEN: How much money were you making a year at that time?
A. Less than $20,000.
Q. Less than $20,000?
A. Yeah, probably around 20.
THE COURT: All right. We'll take our break.
(Recess taken.)
THE COURT: Go ahead.
Q. BY MR. ZONEN: When we left off, I was asking some questions about the interview with Hard Copy. Did that interview finally take place? 5045

A. Yes.
Q. Did you actually watch it on television when it was screened?
A. No.
THE BAILIFF: Can you turn your microphone on?
Q. BY MR. ZONEN: I asked you about the interview with Hard Copy. You finally did that interview, did you not?
A. Yes.
Q. Did you watch it on television when it was screened?
A. No.
Q. Have you ever watched it?
A. No. I watch a little bit, you know, when I --
Q. Did you receive $20,000?
A. Yes.
Q. Okay. Do you know if your friend Evangeline got any money?
A. She didn't get any money from them, no. I gave her some money.
Q. Was that interview -- was that interview with Hard Copy before or after your interview with the sheriff's detectives?
A. After.
Q. Was it before or after your deposition with Larry Feldman and Johnnie Cochran? 5046

A. Oh, before.
Q. It was before the deposition?
A. Yes.
Q. Do you remember being asked some questions about the Hard Copy --
A. Yes.
Q. -- interview during that deposition?
A. Yes.
Q. Did Mr. Jackson ever have a nickname for your son, for Jason, that he used?
MR. MESEREAU: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. ZONEN: Did you ever hear Mr. Jackson call your son by a name other than Jason, his real name?
A. Yes.
Q. What name was that?
A. “Rubba.”
Q. “Rubba,” R-u-b-b-a, do you think?
A. I think.
Q. Is that what it sounds like?
A. Yeah.
Q. Did you ever hear him call other kids “Rubba”?
A. Yes.
Q. Did he call Wade Robeson “Rubba”?
A. Yes.
Q. Did he call Macaulay Culkin “Rubba”? 5047

A. Yeah.
Q. Did you ever receive any gifts from Mr. Jackson?
A. Yes.
Q. What kind of gifts did you receive from him?
A. I don't remember. They were a lot.
Q. Do you remember any of them?
A. He told me to get whatever I want, you know, like promotional things that he'll get from the companies, or toys for my son.
Q. Do you mean if he had them in his possession?
A. Yeah. He will buy little stuff for me, too.
Q. And he would give them to you?
A. Yeah.
Q. Did he ever give you any furniture?
A. Yeah.
Q. What kind of furniture?
A. I remember one time he -- he had a table in the attic, and he say he doesn't want it there. And I asked him if I could take it, and he said, "Yeah, sure. Take it."
Q. The attic where?
A. The attic at Havenhurst.
Q. At Havenhurst?
A. Yeah.
Q. How long ago was that?
A. When I first started there, to work there. 5048

Q. So ‘86?
A. Yeah.
Q. All right. Any other things that you can remember that he gave you over the years?
A. Toys for my son.
Q. Toys for your son? Did he ever give you money?
A. I don’t remember.
Q. You don’t remember if he gave you money, or how much, or how often?
A. How often? No, I don’t remember.
Q. All right. When you had the deposition with Johnnie Cochran, did he ask you if you ever took something from --
MR. MESEREAU: Objection; misstates the evidence. There were other lawyers involved.
THE COURT: Overruled.
You may --
Q. BY MR. ZONEN: When you had the deposition --
It was overruled, Your Honor?
THE COURT: It was overruled. Yes.
Q. BY MR. ZONEN: When you had the deposition with Johnnie Cochran, did he or any other lawyer representing Michael Jackson ask you if you took something from Michael Jackson’s room?
A. I don’t remember.
Q. Did they ask you about a watch? 5049

A. Yeah.
Q. Do you remember the watch?
A. Yes.
Q. Did you have a watch from Michael Jackson?
A. Did he have it?
Q. No. Did he ever give you a watch?
A. I got it from his room.
Q. What kind of a watch are we talking about?
A. It was a toy watch. You know, like I think it was from one of his commercials or something.
Q. Did you --
A. That I had it, and he look at it, and he say, “Oh, that’s nice.” And I say, “Yeah, I got it from your room.” And he didn’t -- I told one of the housekeepers that I -- “Oh, look what I got from his room.” But I guess I used to get stuff from his room and --
Q. Are you talking about promotional things?
A. Yeah. Things like that.
Q. What is a promotional item? What do you mean by that?
A. Like when he make a commercial. I think this watch was from Captain Eo.
Q. I’m sorry?
A. I think it was from one of his videos.
Q. Did he have his name on it?
A. Yeah.
Q. Did it have his picture on it? 5050

A. Yes.
Q. What was that watch worth, do you think?
A. About $10, probably.
Q. At some time were you contacted by an attorney or did you retain an attorney?
MR. MESEREAU: Objection; compound.
MR. ZONEN: I'll withdraw the question.
Q. Did you ever retain an attorney?
A. I don't understand.
Q. Oh. Did you ever hire a lawyer?
A. Oh. Did I personally went to a lawyer and say -- no.
Q. Okay. Do you know Terry Cannon?
A. Yes.
Q. Do you know Kris Kallman?
A. Yes.
Q. Do you know them to be lawyers?
A. Yes.
Q. All right. Did either of those two lawyers represent you?
A. Yes, at one time.
Q. Did they represent Jason?
A. Yes.
Q. How did that happen? How did you come into contact with these two lawyers?
A. Well, since I -- I was felt like --
MR. MESEREAU: Objection. Relevance; 352.
THE COURT: Sustained. 5051

Q. BY MR. ZONEN: Did Jason get subpoenaed to appear at a deposition?
A. Yes.
Q. How old was Jason at that time?
MR. ZONEN: We forgot the tags. Would you mark the next two exhibits in order, please?
THE WITNESS: Probably about 12.
Q. BY MR. ZONEN: Did he actually get a subpoena to appear at a deposition?
A. No, they told me that they were going to subpoena him.
Q. Was that at the end of your deposition?
A. Yes, they told me they want him and myself at another office. Not there, but another office. Mr. Cochran told me.
Q. All right. Were you concerned about Jason giving a deposition?
A. At that time, yeah.
Q. Did you think he --
MR. MESEREAU: Objection. Leading; move to strike.
THE COURT: Overruled. Next question.
Q. BY MR. ZONEN: What were your concerns about Jason giving a deposition?
MR. MESEREAU: Objection. 352; foundation.
THE COURT: Overruled.
Q. BY MR. ZONEN: You can answer the question. What was your concern? 5052

A. That he -- being so young, that he was going to be embarrassed and teased by other kids.
Q. All right. At some point in time, did you talk with -- let me change that. At some point in time, did you agree to file a lawsuit against Michael Jackson?
A. Not at that time.
Q. Do you know if there was some kind of a settlement with Michael Jackson's attorneys?
A. Yes.
Q. Did you receive -- and I'm not asking you how much, but did you receive compensation?
A. Yes.
Q. Did you receive payment?
A. Yes.
Q. Did Jason also receive payment?
A. Yeah. Yes.
Q. When did he receive his payment?
A. I believe it was his 18th birthday.
Q. His 18th birthday?
I had asked you a question about the watch from his room. Did Mr. Jackson ever talk to you about being able to take things if you wanted to?
A. He never told me that.
Q. Did he say anything like that?
A. Oh. No.
Q. There was no conversation about that?
A. He told me that sometimes people gave him 5053

things, and that he'd display it, and then -- you know, and then he would like to get rid of it.
Q. Did you show him the watch?
A. Yeah. At one time I was wearing it, one of his jackets, and he say -- and he told me that it was his jacket. And I say, "Yeah, I was cold." And he say, "Oh, that's okay."
MR. ZONEN: May I approach the witness, Your Honor?
THE COURT: Yes.
Q. BY MR. ZONEN: I have two photographs previously shown to counsel. I'd like to show you these two exhibits, if I can. Exhibit No. 781 and Exhibit No. 782.
And do you see the numbers here? This is 781 and that's 782. I'm going to put them both in front of you.
A. Uh-huh.
Q. And then I'll go back.
781, would you pick that one up, please, and tell us what that photograph is? Take a look at it.
A. That was one of his school pictures.
Q. And who is "he"?
A. My son.
Q. Your son Jason. How old was Jason in that photograph?
A. I would say about ten.
Q. About ten years old? Do you remember that 5054

1 photograph being taken?
2 A. No.
3 Q. But you do recognize him?
4 A. Yes.
5 Q. Is that an accurate photograph of Jason when
6 he was about ten years old?
7 A. Yes.
8 Q. All right. Look at the another one now,
9 please, I think 782. And what is that a photo of?
10 A. My son and I.
11 Q. All right. The two of you together?
12 A. Yes.
13 Q. All right. Is that photograph dated?
14 A. Yes.
15 Q. Whose handwriting is that?
16 A. Mine.
17 Q. Okay. And what is the date on that?
18 A. 1994.
19 Q. And your son was -- what was the month on
20 that?
21 A. The month is March.
22 Q. March? It's written in Spanish, is it not?
23 A. Yes.
24 Q. But it's March 19 --
25 A. '94.
26 Q. '94. And how old was he at that time?
27 A. About 14.
28 Q. All right. He would turn 14 in May of '94? 5055

A. Uh-huh.
Q. So he was 13 at the time; is that right?
A. 13.
Q. Is that photograph an accurate photograph of your son at that time?
A. Yes.
MR. ZONEN: Your Honor, I would move both of those exhibits into evidence.
MR. MESEREAU: No objection.
THE COURT: They're admitted.
MR. ZONEN: I'd ask to publish them at this time.
THE COURT: All right.
Q. BY MR. ZONEN: We'll start with 781. Could we dim the lights, if we could? And could you take a look over your shoulder and tell us, is that the photograph that you identified?
A. Yes.
Q. And how old was he at that time again?
A. About ten.
Q. About ten. And then the second photograph, 782. And he was at that point 13?
A. Yes.
Q. All right. Was that about the time that he was being interviewed by law enforcement?
A. Yes, I think.
MR. ZONEN: Thank you. I have no further 5056

1 questions.
2 THE COURT: Cross-examine?
3 MR. MESEREAU: Yes, please, Your Honor.
4 If I may take a second, Your Honor, just to
5 set up.
6 THE COURT: Yes, you may.
7 MR. MESEREAU: Thank you.
8
9 CROSS-EXAMINATION
10 BY MR. MESEREAU:
11 Q. Ma'am, I'll say good morning, but I think
12 it's afternoon. Okay?
13 My name is Tom Mesereau and I speak for Mr.
14 Jackson, okay? We met for the first time at the
15 break, right? We've never spoken before that,
16 right?
17 A. No.
18 Q. All right. Now, if anything -- if anything
19 I ask you is unclear, please don't answer it, okay?
20 Just say you don't understand. Okay?
21 A. Okay.
22 Q. And if you don't understand, I'll try and
23 rephrase it --
24 A. Uh-huh.
25 Q. -- to make it more understandable, okay?
26 If you're not sure about what I'm asking,
27 just don't answer. Just make sure it's clear in
28 your mind what I'm asking for, okay? 5057

You know I'm on his side, okay?
A. Okay.
Q. Mr. Jackson, all right?
Now, you began working for Mr. Jackson in
1986; is that correct?
A. Yes.
Q. And do you know approximately what month
that was?
A. No.
Q. Okay. And you stopped working for Mr.
Jackson in approximately 1991, right?
A. Yes.
Q. And you never worked for him since you
stopped working in 1991, right?
A. No. I never went back.
Q. Okay. Now, you testified that in the
apartment owned by Mr. Jackson that you referred to
as "The Hideout," there was no furniture, right?
A. Uh-huh.
Q. Was there any bed in there at all?
A. No.
Q. Okay. And approximately when were you
cleaning that apartment as part of your work?
A. Do you mean how long would it take me to
clean or --
Q. No, no, let me rephrase it.
During what period of time do you remember
you were going to that apartment and cleaning it? 5058

A. Probably a year. I don't remember.
Q. And would you go to clean that apartment
when Mr. Jackson was not there?
A. Yes.
Q. Do you remember Mr. Jackson going on what
was called a "Bad" tour; do you remember that?
A. Yes.
Q. Do you remember Mr. Jackson produced an
album and a videotape called "Bad"?
A. Yeah. Yes.
Q. And do you remember he was traveling on that
tour from approximately September of 1987 to January
of 1989?
A. Yes.
Q. And during that period of time he was often
out of the country, wasn't he?
A. Yes.
Q. And he told you about where he was going,
didn't he?
A. Yes.
Q. He told you he was going to Japan, right?
A. Yes.
Q. Australia, right?
A. Yeah.
Q. And a lot of cities in America, right?
A. Yes.
Q. New York, right?
A. Yes. 5059

Q. Indianapolis? Went to Texas? Georgia?
MR. ZONEN: I'll object as beyond the scope
of her knowledge; lack of foundation.
THE WITNESS: I don't know.
MR. MESEREAU: I think she's answering she
did know, Your Honor.
THE WITNESS: He told me he was on tour,
but --
MR. ZONEN: There's an objection.
THE WITNESS: You know --
THE COURT: The only one she said she didn't
know were the last two, so I'll overrule the
objection.
Q. BY MR. MESEREAU: So you knew he traveled to
Italy on that tour, correct?
MR. ZONEN: I'm going to object on lack of
foundation or based on hearsay.
MR. MESEREAU: State of mind, Your Honor.
I'll be happy to rephrase it if the Court wants.
THE COURT: The objection is overruled.
Q. BY MR. MESEREAU: Did you know that he
traveled to Italy on that tour as well?
A. No.
Q. How about Austria?
A. I don't remember.
Q. And England?
A. I don't remember.
Q. Do you remember he went to a lot of 5060

countries --
A. Yes.
Q. -- on that tour? And he told you that,
didn't he?
A. Yes.
Q. And that tour lasted almost a year and a
half, didn't it?
A. Not really. I didn't stop seeing him for a
year and a half.
Q. But he was out of the country much of the
time, wasn't he?
A. Yeah.
Q. And he was out of Los Angeles much of the
time?
A. Out of -- yes.
Q. Now, you didn't often see him -- excuse me.
Let me rephrase that.
Do you remember him staying overnight at the
hideout apartment?
A. Yeah.
Q. Okay. And he didn't like to invite other
people to that apartment, right?
MR. ZONEN: I'll object as speculative; lack
of foundation.
MR. MESEREAU: I'll rephrase.
Q. Do you know whether or not Mr. Jackson liked
to keep his presence at that apartment private?
MR. ZONEN: Objection; speculative. 5061

THE COURT: Overruled.
You may answer.
THE WITNESS: I don't know.
Q. BY MR. MESEREAU: Okay. Okay. But you
didn't see him invite lots of people to that
apartment, did he?
A. No, I didn't see many people.
Q. Okay. And you were the only one that would
clean that apartment, right?
A. Yeah.
Q. And did you used to help Mr. Jackson prepare
when he was leaving town for the "Bad" tour?
A. Yes.
Q. And what did you used to do for Mr. Jackson
to help him?
A. Pack his stuff, his makeup, his clothes, and
shine his shoes.
Q. And he went on approximately 123 concerts
during that period, didn't he?
A. I don't know.
MR. ZONEN: I'm going to object as lack of
foundation.
Q. BY MR. MESEREAU: Do you know how many --
THE COURT: She said, "I don't know," so next
question.
Q. BY MR. MESEREAU: Okay. When you used to
clean the home at Havenhurst in Encino -- okay?
Havenhurst is a street, right? 5062

A. Yes.
Q. And that was where Michael Jackson's parents lived --
A. Yes.
Q. -- right?
Did other family members live there at the time you were cleaning that house?
A. I think Janet was still there. And LaToya.
Q. Okay. So to your knowledge, at the time you cleaned that house, his parents, Janet, LaToya and Michael were living there, right?
A. Yeah.
Q. And would you go there every day?
A. Yes.
Q. Okay. And were there other people besides you that cleaned the house?
A. Not at that time. They didn't have a housekeeper. I mean, they have one, but it quit after about two months.
Q. Did you appear to be the primary housecleaner?
A. Well, while Mr. Jackson was on tour, I end up staying, cleaning the house too.
Q. Okay. So when he was out of town, you would still go there to work, right?
A. Yeah.
Q. Now, would you bring Jason there when --
A. Yes. 5063

Q. -- when Mr. Jackson was out of town?
A. Yeah.
Q. And where would Jason typically be when you worked at the house while Mr. Jackson was out of town; do you know?
A. Outside in the arcade room. At the house.
Q. Okay. And would you see Mr. Jackson's parents when you used to clean the house?
A. Yes.
Q. Okay. Would you see Janet?
A. Sometimes.
Q. And how about LaToya?
A. Yeah, sometimes.
Q. Okay. And what areas of the house did you used to clean?
A. The whole house.
Q. Okay. Every day?
A. Yeah. If there was nothing else to do.
Q. Now, how long did you work -- excuse me. Let me rephrase that. For how long a period of time did you clean the house at Havenhurst?
A. While he was on tour, I guess. I don't remember. But it was many months, because Bill Bray told me that at least it's going to be about six months that he was going to be out of -- out of the country, and either I be laid off or work at the house. 5064

Q. Okay. And did there come a point in time when you stopped cleaning the house on Havenhurst?
A. Yes.
Q. And approximately when was that, if you remember?
A. No.
Q. Okay. Was it 1986, do you think?
A. No.
Q. 1987?
A. 1987, yeah.
Q. Do you think it was 1987?
A. Yeah.
Q. Okay. When you stopped cleaning the house at Havenhurst, you kept working for Mr. Jackson, right?
A. Yes.
Q. And what did you do for Mr. Jackson after you stopped cleaning the house on Havenhurst?
A. Well, went back to my same routine. Cleaning his room and mainly being there. Even if I didn't have anything to do, he wanted me in his room.
Q. Okay. And which room are you talking about now?
A. His bedroom.
Q. Okay. His bedroom now?
A. In Encino.
Q. In Encino, okay. Okay. So Mr. Jackson 5065

would leave town, but always wanted you to still
come to the house and do your work, right?
A. Yes.
Q. And you said that Mr. Bray told you
something about you might lose your work?
A. No, no, no. He told me that I either be
laid off or -- well, probably it's the same thing,
or work at the house.
Q. Okay. Okay. When you stopped working at
the house on Havenhurst, what were you doing then
for Mr. Jackson?
A. When I stopped working at the Havenhurst --
do you mean at the house?
Q. Yes. You kept working for Mr. Jackson,
right?
A. Yes.
Q. And what were you doing then?
A. The same thing I was hired to do for him.
Pick up his clothes.
Q. And where were you doing that?
A. Cleaning his room. At the Havenhurst.
Q. No, no, after you stopped working at
Havenhurst.
A. Oh.
Q. Okay?
A. Uh-huh.
Q. You worked at Havenhurst for a while, right?
A. Yeah. 5066

Q. And then at some point you stopped cleaning Havenhurst, didn't you; is that right?
A. Yeah, but we still live there -- I mean, he still live there at the Havenhurst.
Q. Okay. I'm sorry. Maybe I'm confusing you. There was a point in time when you didn't clean Havenhurst anymore; is that right?
A. Uh-huh.
Q. And approximately when was that, do you think?
A. No, I don't remember.
Q. Okay. You did work at Neverland at one point, right?
A. Yeah, that was back after about three years.
Q. And when you worked at Neverland, were you still working at Havenhurst?
A. When I still working --
Q. I'm sorry?
A. -- at Neverland?
Q. Yes. Let me rephrase the question. When you were working for Mr. Jackson at Neverland - okay? - were you still doing work at the home on Havenhurst?
A. No.
Q. You were working full time at Neverland then, right?
A. No.
Q. No? 5067

A. I would go to the hideout.
Q. Okay.
A. And sometime he will tell me to go to Havenhurst to get stuff, or retrieve something, or --
Q. So when you were living at Neverland and working at Neverland, you still would sometimes go to Havenhurst, right?
A. Yes. Sometimes.
Q. But most of the time you did your work at Neverland, right?
A. Neverland and the hideout.
Q. Okay. Okay. Now, Mr. Jackson was very generous to you, wasn't he?
A. Yes.
Q. He gave you a couple of televisions; is that right?
A. Yes.
Q. And you would also ask him from time to time if you could take something, and he would often say "Yes," right?
A. (Nods head up and down.)
Q. What are some of the things that you asked him that you'd like to have?
A. Knickknacks. And clothes. He gave me a couple of jackets from his tour, I think. I don't remember. It was -- there were a lot of stuff.
Q. And did he give you any cash himself? 5068

A. I don’t remember.
Q. Didn’t he give you approximately $5,000 total at one point?
A. I don’t remember.
Q. Wouldn’t he give you 500 or 300 or $200 at a time?
A. I don’t remember.
Q. Do you remember saying that in your deposition with Mr. Feldman?
A. Yeah. I probably did, yeah.
Q. So let me ask you what you remember.
A. Uh-huh.
Q. Do you remember Mr. Jackson giving you 500 or 300 or $200 at a time?
A. He probably did, but at this time I don’t remember.
Q. Okay. Do you remember saying in your deposition that, in total, he may have given you $5,000?
A. I probably did.
Q. Okay. Does that sound accurate to you?
A. Yeah, probably, I did. It wasn’t that much, probably, but I don’t remember how much he gave me.
Q. Okay. But would you ask him for cash sometimes?
A. No.
Q. Would he just volunteer and give it to you?
A. I don’t remember that, you know. I don’t -- 5069

I don't -- I think so, but I don't remember.
Q. Okay. I'm probably not being clear. I'm
asking why Mr. Jackson gave you money. Would you
ask him for money once in a while?
A. I think I did -- I don't remember.
Q. Okay. But you do remember him giving you
money from time to time, right?
A. Yeah.
Q. Okay. And you're not sure of the total,
right?
A. No.
Q. Okay. And did he give you money from time
to time during the entire period that you worked for
him?
A. Someone -- yeah.
Q. Okay. And you don't recall him ever saying
"No" if you ever told him you needed some money, did
he?
A. No.
Q. Okay. He always was generous with you with
money, wasn't he?
A. Yeah. Yes.
Q. Okay. All right. Now, your deposition was
taken in 1993, right? Do you remember that?
A. I don't remember.
Q. Okay.
A. But I think it was '94. I don't remember.
Q. Would it refresh your recollection if I just 5070

show you the transcript with a date on it? Would that help you remember?
A. I mean, I'll read it and -- I know that it was that, but I don't remember.
Q. If you saw the transcript, might that help you remember? Would you like to see it?
A. Yeah. I mean, you can put whatever that you want to and I will say probably.
Q. No, I don't want to do that. Would it help refresh your recollection --
A. No.
Q. -- if I just show you the date on the deposition?
MR. ZONEN: Your Honor, I'd be prepared to stipulate to the two dates of the transcript.
MR. MESEREAU: Okay. Sure.
MR. ZONEN: And the first date is December 15, 1993.
MR. SNEDDON: Can't hear you.
MR. ZONEN: The first date --
MR. SNEDDON: Turn it on.
MR. ZONEN: We make this complicated, don't we?
The first date is December 15, 1993. The date of the second day of the deposition was January 11, 1994. I would so stipulate.
MR. MESEREAU: So stipulated.
THE COURT: All right. I'll approve that 5071

1 stipulation.
2 THE WITNESS: I do remember ‘94. But I
3 don’t remember the dates.
4 Q. BY MR. MESEREAU: Okay. Okay. Do you
5 remember in your deposition saying you had never
6 seen Mr. Jackson touch anyone improperly?
7 A. Yeah, I --
8 Q. Do you remember saying you never saw him
9 touch anyone?
10 A. Yeah.
11 Q. You did say that, didn’t you?
12 A. Yes.
13 Q. Okay. And in that deposition, you told the
14 truth, right?
15 A. As -- as I recall it at that time, yeah.
16 Q. You told the truth at that time, right?
17 A. As I remember it.
18 Q. Yes. And you were under oath, right?
19 A. Yes.
20 Q. Okay. And you said that you had never seen
21 Michael Jackson touch anyone in a sexual way, right?
22 A. Yeah.
23 Q. Okay. And you said at no time while you
24 worked for Michael Jackson did you ever see him have
25 sexual contact with anyone, right?
26 A. When I say “sexual,” I mean sexual.
27 Q. But you did say under oath that you had
28 never saw Mr. Jackson have sexual contact with 5072

1 anyone, right?
2 A. No. No.
3 Q. Isn't that what you said?
4 A. Yeah, yeah, that's what I said.
5 Q. Okay. Now, you mentioned that Mr. Jackson
6 has a Jacuzzi, right?
7 A. Where at? At the Havenhurst?
8 Q. Well, let's start with Havenhurst.
9 A. Uh-huh.
10 Q. Did Mr. Jackson have a Jacuzzi at
11 Havenhurst?
12 A. Yes.
13 Q. And just tell the jury where the Jacuzzi
14 was, please.
15 A. It's outside his patio.
16 Q. Okay.
17 A. Outside of his bedroom.
18 Q. And did various family members use that
19 Jacuzzi?
20 A. No.
21 Q. Did you ever see anyone use that Jacuzzi at
22 Havenhurst?
23 A. Only Mr. Jackson.
24 Q. And it was outside?
25 A. Yes.
26 Q. Okay. Can you see that Jacuzzi from the
27 house?
28 A. No. 5073

Q. Can you see it from any windows?
A. Not from the house. From a separate -- from a separate -- from -- I think from up on the garage, you can see it, but it's not a bedroom.
Q. Did you ever see Mr. Jackson in that Jacuzzi at Havenhurst?
A. I remember one time.
Q. One time seeing Mr. Jackson use the Jacuzzi at Havenhurst?
A. Yeah.
Q. Okay. But you didn't see anyone else ever use it?
A. There was a little -- a boy there.
Q. Did you ever see his parents use the Jacuzzi?
A. Whose parents? Michael?
Q. Yeah.
A. No.
Q. Did you ever see Janet use it?
A. No.
Q. Ever see LaToya use it?
A. No.
Q. Ever see anyone use it besides Mr. Jackson?
A. No.
Q. All right. Was there a Jacuzzi at Neverland?
A. Well, inside his bedroom there is a bathroom with a Jacuzzi in it. 5074

Q. Okay. And you saw Mr. Jackson use that
Jacuzzi, didn't you?
A. Yeah.
Q. Is it downstairs or upstairs in his bedroom
area?
A. Downstairs.
Q. It's downstairs; is that right?
A. His bedroom, yeah.
Q. Okay. Now, the prosecutor asked you
questions about Mr. Robeson, okay?
A. Uh-huh.
Q. And did you say that Mr. Jackson was
sleeping on a bed in the lower level of his bedroom?
A. Yes.
Q. Okay. You didn't see him sleeping in the
bedroom on the upper level?
A. No.
Q. And was it your belief that during the time
you worked at Neverland, that Mr. Jackson only slept
on the bed on the lower level?
A. Yes. There were times that the other bed
was used.
Q. Okay.
A. But I never saw him in that bedroom.
Q. So you would see the bed upstairs used, but
you didn't know who had used it, right?
A. No.
Q. You would see the bed downstairs used, but 5075

1 you didn’t know who used it, right?
2 A. It was time when it was just one -- one bed
3 was undone.
4 Q. Sometimes, right?
5 A. Sometimes.
6 Q. And sometimes there was a bed upstairs that
7 seemed undone, right?
8 A. Yeah.
9 Q. And you were responsible for making both
10 beds, right?
11 A. Yes.
12 Q. Okay. Have you ever seen Mr. Jackson lying
13 on his bed watching television?
14 A. Yeah. A couple of times.
15 Q. How many times did you see Mr. Jackson lying
16 on his bed watching television?
17 A. Probably a couple of times.
18 Q. And you would see him watch videos also,
19 right?
20 A. Yeah.
21 Q. Were you often in Mr. Jackson’s room when he
22 was watching television?
23 A. No.
24 Q. You typically cleaned his room when he
25 wasn’t there, right?
26 A. Yeah.
27 Q. Is that true?
28 A. Yes. 5076

Q. And it was your understanding that you were supposed to clean his room when he wasn't in there, right?
A. No.
Q. Was it your understanding that you weren't supposed to go in when Mr. Jackson was in the room?
A. Yeah. Sometimes I'll unlock his room and he'll be there, and he tell me that it was okay to come in.
Q. Okay. And sometimes you would unlock his door, he'd ask you not to come in, right?
A. Yeah.
Q. Most of the time when you cleaned his room at Neverland, he wasn't in it, right?
A. Most of the time when he wasn't in?
Q. Let me rephrase. Let me rephrase.
During the time you worked at Neverland, most of the time when you cleaned his room, he wasn't in there, right?
A. Yeah.
Q. You okay?
Do you want some water?
A. Huh?
Q. Do you want some water?
A. No, that's okay.
Q. Was it your understanding that when you cleaned Mr. Jackson's room you were usually supposed to do it when he wasn't around? 5077

A. Yeah.
Q. Okay. Okay. And if you opened the door and he was in there, you would ask for permission to come in, right?
A. Yes.
Q. Okay. Now, his bedroom is a very big area, isn't it?
A. Yes.
Q. How would you describe it?
A. Big.
Q. Very big, isn't it?
A. Uh-huh. Yeah.
Q. And how do you get into his bedroom? If you're going -- let me rephrase it. If you're going into Mr. Jackson's room, what do you have to do to get in?
A. Open the door with a key.
Q. Okay. And is that what you would typically do?
A. Yes.
Q. Was there any kind of a bell that would ring?
A. Yes.
Q. And would the bell always ring when you entered?
A. Yeah. But it -- it doesn't have a -- you know, it would ring just once.
Q. Right. Just one ring? 5078

A. And then close, yeah.
Q. Would you then stop it? Would you shut the bell off?
A. I used to unplug it.
Q. You unplugged it. Okay. So you'd hear a ring, and then you would unplug it; is that right?
A. Well, you have to unplug it from the inside of the bedroom.
Q. So you'd open the door, right, with a key?
A. Yeah.
Q. The bell would go off, and then you would unplug it, right?
A. When I was there by myself, I used to unplug it.
Q. Okay. Okay. And then it would stop ringing, right?
A. And it would stop ringing, yeah.
Q. And then you would do your cleaning, right? Is that right?
A. No.
Q. Tell me what --
A. I'll get there --
Q. Yes.
A. -- and then -- once I get there, I unplug it, because when people get close to it, it rings. But it rings, and then it rings one time, it doesn't ring anymore.
Q. Okay. Okay. To stop it from ringing, you 5079

1 would unplug it?
2 A. Yeah.
3 Q. Okay. Okay. All right. Now, do you know
4 who Quincy Jones is?
5 A. Yes.
6 Q. And who's Quincy Jones?
7 A. A writer, I think.
8 Q. Okay. And his daughter used to visit
9 Michael, right?
10 A. At Havenhurst.
11 MR. ZONEN: Beyond the scope of the direct,
12 and irrelevant.
13 THE COURT: Overruled. Go ahead.
14 THE WITNESS: At Havenhurst?
15 Q. BY MR. MESEREAU: Yes.
16 A. I think she was there a couple of times.
17 Q. Her name was Kidada, right?
18 A. I don't know.
19 Q. But you saw her visit Michael, correct?
20 A. Yes.
21 Q. Did you ever see -- do you know who Lionel
22 Ritchie is?
23 A. Yes.
24 Q. Did you ever see his daughter visit the
25 Jacksons?
26 A. Not at Havenhurst.
27 Q. Okay. Did you see her visit Michael?
28 A. Him I remember visiting. 5080

Q. You remember him visiting Michael. You don't remember his daughter?
A. No.
Q. Okay. Before you testified today, did you meet with any prosecutor to discuss what you were going to be asked?
A. Yeah.
Q. And when did that meeting take place?
A. Saturday.
Q. And who did you meet with?
A. I don't remember his name.
Q. Pardon me?
A. Ron, I think.
Q. Prosecutor Zonen?
A. And another one.
Q. Okay. And how long did the meeting take place?
A. Couple of hours.
Q. And how many people were there meeting with you?
A. Just the two of them.
Q. Did they tell you what they were going to ask you in court?
A. They -- they went to what I say before.
Q. Did they discuss the questions they were going to ask you today?
A. Kinda.
Q. And did they discuss your answers with you? 5081

A. No. They told me about, you know, what I say in my deposition before, and if I remember, and there was stuff that I didn't remember.
Q. Did they give you a copy of your deposition to look at?
A. No.
Q. Did they appear to be reading from your deposition?
A. No.
Q. Okay. Did they have any documents they showed you?
A. Yeah. They gave me a paper of things that I say when I talk to another detective.
Q. Okay.
A. Not -- not at my deposition.
Q. Okay. So it was a paper that they gave you to look at?
A. Yeah.
Q. And what was on that paper, if you remember?
A. When I talked to the other detectives, they came, you know, at the beginning.
Q. Okay.
A. The first time.
Q. Do you remember meeting with a lawyer named Larry Feldman?
A. Yes.
Q. And you met with Larry Feldman before your deposition was taken, right? 5082

A. Yes.
Q. And he came out to see you, didn't he? Let me rephrase it. Maybe you don't understand.
A. Yeah, I understand.
Q. You do?
A. But I don't remember. Yeah, I think he did. He came to my house, I think.
Q. He came to your house, didn't he?
A. (Nods head up and down.)
Q. And he wanted to speak to you before your deposition was taken by him, right?
A. Yes. Yes.
Q. Okay. And obviously that was quite a while ago, right? Was that around 1993 sometime?
A. Yes.
Q. Okay. Do you remember how much time Larry Feldman spent with you?
A. No.
Q. Do you remember if it was a long time?
A. I don't remember.
Q. Okay. Was that the only time you met with Attorney Larry Feldman?
A. No. Then I was taken to L.A., and I --
Q. Did you meet with him again?
A. Yeah, for the deposition.
Q. Okay. And he was giving you some advice during the deposition, wasn't he?
A. I don't remember. I don't think so. 5083

Q. Didn’t he advise you from time to time during that deposition?
A. I don’t remember. There were a lot of people talking to me at that one.
Q. And he was one of them talking to you, wasn’t he?
A. Yes.
Q. And you said that deposition went more than a day, right?
A. Yeah. It was twice.
Q. Okay. And was it after that deposition that you first spoke to an attorney named Terry Cannon?
A. That was -- that was after. After when Mr. Cochran told me that my son was going to be subpoenaed and I would have to bring him.
Q. Okay. And then you went to hire an attorney, correct?
A. Then I -- yeah, then I talked to Terry.
Q. Okay. And has he been your lawyer ever since?
A. Yes.
Q. Okay. Has he been your son’s lawyer ever since?
A. Yes.
Q. Okay. When did you last talk to Terry Cannon?
A. I think it was December or November. I don’t remember. It was in December. 5084

Q. Last December?
A. Last December.
Q. Okay. Okay. And do you remember having a meeting with Prosecutor Zonen and Terry Cannon last year?
A. On December? It was -- Zonen? I don't know his last name. He was a tall guy.
Q. Prosecutor Zonen, who you see right here --
A. Oh.
Q. -- do you remember meeting with him?
A. Oh. Yeah, I think he was -- he was there, too. That's when they gave me that deposition.
Q. Okay. Okay. In your deposition, you said that you had never seen Mr. Jackson molest a child, right?
MR. ZONEN: Objection; asked and answered.
THE COURT: Overruled.
Q. BY MR. MESEREAU: In your deposition, you said under oath you had never seen Mr. Jackson molest a child, right?
A. Molest a child? No. Yeah, I say that.
Q. Okay. Was it after that deposition that you were interviewed by Hard Copy?
A. No.
Q. It was before?
A. Oh, before I met with him, with -- at my deposition? No, that interview was before.
Q. So the interview with Hard Copy was before 5085

1 the deposition --
2 A. Yes.
3 Q. -- right?
4 And that's the interview you were paid
5 $20,000 --
6 A. Yes.
7 Q. -- to do, right?
8 A. Yes.
9 Q. And that's the interview that you had your
10 friend Evangeline help you arrange, right?
11 A. Yes.
12 Q. And then after you were paid, you said you
13 paid her some money, right?
14 A. Yeah.
15 Q. Okay. Okay. Did you ever talk to anyone
16 from The National Enquirer?
17 A. No.
18 Q. Is Hard Copy the only media --
19 A. Yeah.
20 Q. -- group that you ever met with?
21 A. Yeah. I guess someone tried to -- someone
22 contacted me from National Enquirer, I think, and
23 from Los Angeles Time.
24 Q. In your deposition, you said the people from
25 Hard Copy are not honest, right?
26 A. Yeah.
27 Q. When did you last talk to anyone from Hard
28 Copy? 5086

A. When did I -- recently?
Q. Let me rephrase it.
A. Uh-huh.
Q. After your interview with Hard Copy, did you ever talk to them again?
A. No.
Q. Okay. Did you tell Attorney Larry Feldman that you were going to be interviewed by Hard Copy?
A. No.
Q. And Evangeline worked at Neverland, right?
A. Yes.
Q. Did you tell anyone else who worked at Neverland, besides Evangeline, that you were going to be paid to interview with Hard Copy?
A. No. Not that I remember.
Q. Now, at some point you learned -- let me rephrase that, excuse me. Let me start again. After your interview with Hard Copy appeared on television - okay? - at some point you learned that other employees at Neverland now wanted to be paid to go on television to talk about Mr. Jackson, right?
A. Did I know that?
Q. Yes.
A. No.
Q. After you hired a lawyer --
A. Uh-huh.
Q. -- you learned that other employees at 5087

Neverland started hiring lawyers, right?
MR. ZONEN: I'll object. Lack of
foundation; speculative.
THE WITNESS: I don't remember that.
THE COURT: Wait.
The objection's overruled.
Q. BY MR. MESEREAU: Did you learn at some
point after your Hard Copy interview was on
television, that now other people who worked for
Michael Jackson were hoping they could make money
doing media interviews like you did?
MR. ZONEN: Objection; speculative.
THE WITNESS: No, I didn't know that.
THE COURT: Overruled.
Q. BY MR. MESEREAU: Did you discuss your Hard
Copy interview with anyone besides Evangeline at
Neverland?
A. I don't remember, no.
Q. Okay.
A. No.
Q. Okay. Who did you work for at Neverland?
A. Did I work for?
Q. Besides Mr. Jackson. I mean, who did you
work -- let me rephrase it.
Obviously you worked for Mr. Jackson, but
did you report to other people?
A. Did I report to other people? Oh.
Q. As part of your job. 5088

A. I was working as part of the household, housekeepers.
Q. And who did you work with; do you remember?
A. The workers? I don't remember their names. But I -- I --
Q. Okay. Now, the Hard Copy interview was in 1993, right?
A. Yes.
Q. It was in December of 1993, right?
A. Yes.
Q. And you stopped working in 1991, right?
A. (Nods head up and down.)
Q. So after you left -- after you stopped working for Mr. Jackson, you stayed in touch with some people who worked for Mr. Jackson, right?
A. No.
Q. What about Evangeline?
A. But she wasn't working there no more.
Q. When did she stop?
A. Before me.
Q. Was she in touch with people at Neverland?
MR. ZONEN: Objection; speculation.
MR. MESEREAU: To your knowledge.
THE WITNESS: Not that I know.
MR. ZONEN: There's an objection.
THE COURT: To her knowledge. I'll limit it. She answered no, not that she knows.
Q. BY MR. MESEREAU: Did you talk to any 5089

representative of the media before you had your deposition taken?
A. Did I -- did I talk --
Q. I'm -- yes, let me rephrase it.
A. Uh-huh.
Q. And if I'm unclear, just tell me, and I'll try and say it again.
You said your interview with Hard Copy was after the deposition, right?
A. No. It was before.
Q. It was before. Okay. How long before it, if you know?
A. About a month.
Q. Okay. Did you discuss the fact that you were going to be interviewed by Hard Copy with any attorney?
A. No.
Q. Okay. Do you remember Evangeline saying to you, "Would you like to go to The National Enquirer"?
A. I don't remember.
Q. Pardon me?
A. I don't remember. I remember a guy called me, but he never told me that someone refer me or --
Q. But didn't Evangeline suggest that you call The National Enquirer?
A. No.
Q. She didn't? She didn't ask you, "Do you 5090

1 want me to find The Enquirer?”
2 A. I don’t remember that, no.
3 Q. Would it refresh your memory if I just show
4 you a transcript --
5 A. Uh-huh.
6 Q. -- of your deposition?
7 A. Oh, okay.
8 Q. Can I do that?
9 A. Yeah.
10 MR. MESEREAU: May I approach?
11 THE COURT: Yes.
12 MR. ZONEN: What page, Counsel?
13 MR. MESEREAU: 208.
14 Q. Have you had a chance to look at that page?
15 A. No. Oh.
16 (Laughter.)
17 Q. You’ve had a chance to look at the page,
18 right?
19 A. Did I what?
20 Q. Have you had a chance to read that page
21 of your deposition?
22 A. Before today?
23 Q. No, no, today.
24 A. Oh, yeah.
25 Q. Okay. I just showed you the page, right?
26 A. Yeah.
27 Q. Have you had a chance to look at it?
28 A. Yeah. 5091

Q. And does it refresh your memory about what Evangeline said to you?
A. You know, tell you the truth, I probably did at that time. And I remember at the time, but this time I don't remember.
Q. Okay.
BAILIFF CORTEZ: Ma'am, speak into the mike.
THE WITNESS: Oops.
Q. BY MR. MESEREAU: Didn't you tell Evangeline that you were willing to talk to The Enquirer?
A. I don't remember.
Q. Okay. Would it refresh your recollection just to look at the page?
A. No.
Q. It wouldn't? So even if you read the page, it won't help, do you think?
A. It won't help me.
Q. Okay. Okay. But you don't remember what you said to Evangeline about talking to The Enquirer?
A. I don't even remember the whole sit -- I don't remember.
Q. Okay.
A. It was a lot -- at that time, you know, it was --
Q. Evangeline called Hard Copy for you, right?
A. Uh-huh. Yeah, I think so.
Q. And she did it for you, right? 5092

A. Yeah, I think she did.
Q. You wanted her to find a way to communicate with Hard Copy, right?
A. Yeah.
Q. Okay. And you wanted to talk to either Hard Copy or The Enquirer, right?
A. I don't remember if it was either of them, but I remember that I say yeah.
Q. Okay. Okay.
A. Because I think they approach her first, someone approach her. And she said, "Well, they want to talk to you, too." That's what I got.
Q. Did you have an understanding with Evangeline that if she arranged these interviews for you, that you would pay her?
A. That I would pay her?
Q. Yes.
A. No.
Q. Did you believe she was just doing it as a friend?
A. Yeah.
Q. Okay. So you didn't have any arrangement with her that you would split the money, right?
A. No.
Q. You gave her some money later on because you appreciated what she had done for you, right?
A. Yeah. Yeah, because of the trouble that she was going -- you know, she did, yeah. 5093

Q. Okay. So you gave her money as a friend, right?
A. Yeah.
Q. Okay. There was no understanding before the interview with her how much she would get?
A. No.
Q. Okay. Okay. Now, Evangeline told you that she had reached Diane Dimond of Hard Copy, right; is that right?
A. Yes.
Q. And Evangeline arranged for you to meet with Diane Dimond, right?
A. Yes.
Q. How many meetings did you have with Diane Dimond with Hard Copy?
A. I think it was just one.
Q. Do you remember going to the Hilton Hotel?
A. My -- yes.
Q. Is that where you saw Diane Dimond during a meeting?
A. Yes.
Q. And that's the meeting Evangeline went with you to, right?
A. Yes.
Q. You told Diane Dimond during that interview that you never told anyone that you had ever seen Michael Jackson molesting boys, right?
A. Yes, I believe so. 5094

Q. And it was Evangeline that negotiated how much money you were going to get, right?
A. Yes.
Q. You learned that you were going to get $20,000 from Evangeline, right?
A. From Hard Copy.
Q. Yeah.
A. Not from Evangeline.
Q. Let me rephrase it to make sure you understand.
A. Yeah.
Q. You learned from Evangeline that you were going to get $20,000 for the interview with Hard Copy, right?
A. Yeah.
Q. Is that correct?
A. Yes.
Q. Evangeline was supposed to speak to Hard Copy about the money you were going to get, right?
A. Yes.
Q. So she was really your assistant, wasn't she?
A. Yeah.
Q. Okay. If you remember, how long was the meeting at the Hilton Hotel with Diane Dimond?
A. About three hours, probably.
Q. Okay. Were there other people at that meeting as well? 5095

A. I don’t remember. I don’t think so.
Q. Do you know if you were given a contract to sign?
A. I signed it, but I don’t remember at what time I did, if it was during that time or after the interview.
Q. But you did sign the contract with Hard Copy --
A. Yeah.
Q. -- right?
A. Yes.
Q. How did you get that contract?
A. How did I what?
Q. How did you get a copy of that contract?
A. I guess they give it to me.
Q. Okay. Did Miss Dimond give it to you directly or did Evangeline give it to you?
A. No.
Q. Pardon me?
A. Miss Dimond gave it to me, I think.
Q. At the meeting?
A. I don’t remember. It was during the -- in the room.
Q. Okay. And you were asked to sign that contract in that room before you left, right?
A. Yeah, I guess so.
Q. Is that what you remember?
A. That’s what I remember. I don’t know. 5096

Q. Okay. Okay. The day after you were
interviewed by Hard Copy, Miss Dimond called you
again, right?
A. The day after?
Q. Yes. The day after your interview with Hard
Copy, Ms. Dimond called you again, right?
A. I don't remember.
Q. Okay.
A. I don't remember her calling me, but I don't
remember if it was the next day or --
Q. Do you remember her wanting pictures of
Michael Jackson?
A. Yeah.
Q. Ms. Dimond wanted you to get her pictures of
Mr. Jackson, right?
A. I don't remember.
Q. Do you remember that?
A. I think I give it to her, but I don't
remember.
Q. Okay. Do you remember saying to Ms. Dimond
you don't have pictures of Michael Jackson?
A. I don't -- ask that --
Q. I'm sorry, I may not be explaining it
properly. Let me just rephrase the question. I'll
withdraw the question.
A. Uh-huh.
Q. The day after you interviewed with Hard
Copy, Miss Dimond called you on the phone, right? 5097

A. I don’t remember.
Q. Well, after the interview with Hard Copy, do you remember at some point in time Miss Dimond called you?
A. I don’t remember.
Q. Okay. Do you remember Miss Dimond ever asking you to get her pictures of Michael Jackson?
A. I don’t remember, but I give it to her sometimes. Or one time, I guess, she got some pictures of him.
Q. And was that part of your contract with the show Hard Copy, that you would give them pictures?
A. Yeah -- yes.
Q. Okay. And when they paid you $20,000, was part of what you had to do to give them pictures?
A. Yes. I guess.
Q. Do you remember sending any pictures of Mr. Jackson’s animals to Hard Copy?
A. I think all the pictures I got, I give her, it was me with animals, probably. But it was me mostly. Not of animals.
Q. Did you send pictures of Mr. Jackson’s lion?
A. No.
Q. How about his tiger?
A. Not -- I was in the picture, but it wasn’t by itself of the --
Q. Okay.
A. -- tiger. 5098

Q. You gave Ms. Dimond a picture of your son with Mr. Jackson, right?
A. With Mr. Jackson? I don't remember, but I -- no, I don't remember.
Q. Would it refresh if I just show you the transcript of your deposition?
A. Uh-huh.
MR. MESEREAU: Okay. May I approach, Your Honor?
THE COURT: Yes.
MR. ZONEN: Page number, Counsel?
MR. MESEREAU: 231.
MR. ZONEN: 231?
Q. BY MR. MESEREAU: Have you had a chance to review that page of your deposition?
A. Yes.
Q. And you said under oath during the deposition that you gave Ms. Dimond a picture of your son and Mr. Jackson, right?
A. Yes.
Q. Okay. And you could -- you didn't think people would notice your son on the show, right?
A. Yeah. Probably. Probably, yes.
Q. You said in the deposition you didn't think anybody would recognize who your son was on the Hard Copy show, right?
A. Yeah. Probably I said that.
Q. That's what you said, right? 5099

A. I probably -- yes.
Q. Okay. Now, at some point, you called Diane Dimond and she didn't return your calls, right?
A. Yeah.
Q. You called her because you thought she had lied, right?
A. She had lied?
Q. Yes.
A. I didn't like -- I thought that -- that Hard Copy interview thing was going to be shown on Hard Copy, and then I see my pictures everywhere, and even in The National Enquirer, and that's what I thought that it was. You know, I didn't know that they can sell the story to someone else. That's how I felt.
Q. Do you remember telling Ms. Dimond that you had other pictures from Neverland Ranch --
A. I don't remember.
Q. -- that you could get? Do you remember that?
A. No, I don't remember.
Q. Do you remember Miss Dimond telling you she could send a messenger to get other pictures that you had of Mr. Jackson?
A. I don't remember that.
Q. Okay. You gave Ms. Dimond pictures of Mr. Jackson after your interview, right?
A. I don't remember. 5100

Q. You don't remember if you gave the pictures before or after the interview?
A. No, no, no. After -- of Mr. Jackson? No.
Q. Okay. I'm asking you when you gave pictures to Miss Dimond. Was it before the interview or after it?
A. Oh. I think it was after.
Q. The prosecutor asked you questions about Wade Robeson. Okay?
A. Uh-huh. Yes.
Q. Do you remember saying in your deposition that you saw Mr. Robeson sleeping in Mr. Jackson's bed?
A. Yes.
Q. Do you remember you were asked how many times you saw that, and you said, "Maybe twice"?
A. I don't remember that I say that, but I think that's what it was.
Q. Maybe twice?
A. I remember -- I don't remember what I say at the time, but I think that was the time -- I mean, that was the times.
Q. So you think you saw Mr. Robeson in Mr. Jackson's bed maybe twice?
A. Yeah.
Q. And you think you saw Mr. Jackson in a shower with Mr. Robeson one time, right?
A. Yes. 5101

Q. But you said the shower was fogged up and you couldn't really see, right?
A. I saw the figure.
Q. You saw the figure. And you heard a lot of laughing, right?
A. Yeah.
Q. And you thought they were playing, right?
A. Yes.
Q. In your deposition, you said under oath you couldn't tell whether they were touching each other or not, right?
A. Yeah.
Q. Do you remember meeting Joy Robeson, who is Mr. Robeson's mother?
A. Yes.
Q. When did you first meet Joy Robeson?
A. I don't remember.
Q. Do you know about when it was, what year?
A. No.
Q. Okay. You told the jury that you walked into the door at the hideout apartment and saw your son on Mr. Jackson's lap one time, right?
A. Not at the hideout.
Q. Where was it?
A. Havenhurst.
Q. Okay. And you said your son was reading a book?
A. (Nods head up and down.) 5102

1 Q. Is that right?
2 A. Yeah.
3 Q. Okay. The prosecutor asked you questions
4 about finding money in your son's pants, right?
5 A. Uh-huh.
6 Q. You found the money in his pockets, correct?
7 A. Yes.
8 Q. Have you ever seen that Hard Copy interview
9 that you did?
10 A. No.
11 Q. Okay. Has anyone from the prosecution tried
12 to show it to you?
13 A. No.
14 Q. No? Okay.
15 A. I saw little hints. One day I got home and
16 they were showing, you know, like little parts, what
17 they going to show the next day. That's what I saw.
18 Q. Okay. Do you remember stating that you
19 thought Michael Jackson was very childlike?
20 A. Yeah. Yes.
21 Q. He very often acted like a child, in your
22 mind, right?
23 A. Yes.
24 Q. Do you remember saying that he would let his
25 chimpanzee sleep in his room?
26 A. Yes.
27 Q. Do you remember that?
28 A. Yeah. 5103

1 Q. The chimpanzee's name was "Bubbles," right?
2 A. Yes.
3 Q. And Bubbles would sometimes stay in Mr.
4 Jackson's room, right?
5 A. Yes.
6 Q. You talked about Bubbles wearing a diaper,
7 right?
8 A. Yes.
9 Q. You said the monkey didn't like the diaper,
10 right?
11 A. Yeah.
12 Q. And you would often clean after the monkey
13 was in Mr. Jackson's room, right?
14 A. Yes.
15 Q. You said at one time Bubbles got too old and
16 then there was another monkey, right? Right?
17 A. I remember -- I don't remember about the
18 other monkey, but it was Bubbles.
19 Q. Mr. Jackson and a lot of children used to
20 play with the monkey, didn't they?
21 A. At Havenhurst he only had Bubbles.
22 Q. Okay. But children would come and play with
23 the monkey, wouldn't they?
24 A. Not at Havenhurst. Just one time.
25 Q. Where would you see Bubbles?
26 A. At Havenhurst, I think.
27 Q. Okay. Did you ever see Bubbles at
28 Neverland? 5104

A. I don't remember. I think it was bigger at that time.
Q. Okay. But he was at Neverland, right?
A. He was at Neverland? I don't remember.
Q. Okay. Okay. But you would often at Neverland see Mr. Jackson playing with kids, right?
A. Yes.
Q. He would play with kids all the time, wouldn't he?
A. Yes.
Q. And kids would often visit Neverland, right? Is that true?
A. Yes.
Q. Did you -- excuse me, let me rephrase that. Do you remember a dance room where Mr. Jackson used to do dance routines?
A. A what?
Q. I'm sorry. Let me rephrase it. Do you remember a dance room --
A. Oh, a dance room, yeah.
Q. -- where Mr. Jackson used to practice dance routines?
A. Where at? Neverland?
Q. Anywhere.
A. Yes.
Q. Where was the dance room?
A. Behind the theater.
Q. At Neverland, right? 5105

A. Yes.
Q. And you used to see Mr. Jackson go there and practice dance, right?
A. Uh-huh.
Q. You also saw Mr. Jackson teaching children to dance, right?
A. Playing with the kids.
Q. Yes.
A. Yeah.
Q. And he used to teach children how he dances, right?
A. I don't know if it was the children, but I see him with the kids.
Q. Okay. In the dance room, right?
A. In the dance room, yeah.
Q. Okay. Have you ever discussed your son's claim that Mr. Jackson improperly touched him with your son? Have you ever had a discussion about that?
A. At one time, back in '94.
Q. Okay. You talked to your son about what he said --
A. I'm --
Q. I'm sorry, go ahead.
A. I say, "What's going on?" And he say, "I just don't want to talk about it."
Q. This was in 1994?
A. '94, I think so. 5106

Q. Have you ever discussed with your son his claims about Mr. Jackson?
A. No.
Q. Never?
A. No. I -- I ask him that I was going to ask his counselor.
Q. Okay.
A. And he say no.
Q. Okay. So you've never discussed --
A. No.
Q. -- your son's claims with him?
A. No.
Q. Okay. Have you had a meeting with Prosecutor Sneddon?
A. Yeah, one time.
Q. And approximately when was that?
A. '93, I think.
Q. Okay. Have you met with Mr. Sneddon since 1993?
A. No.
Q. Okay. Have you had any meetings with any sheriffs to discuss your testimony?
A. Other than -- no.
Q. Okay. Have you ever had a meeting with any sheriff about what you're going to say today?
A. Other than Saturday, that, you know, they told me that I was going to come here.
Q. Okay. Okay. Was any lawyer at that 5107

meeting?
A. No.
Q. Okay.
THE COURT: Shall we take our break?
MR. MESEREAU: Okay.
(Recess taken.)
THE COURT: Go ahead.
MR. MESEREAU: Thank you, Your Honor.
Q. Miss Francia, I'd like to ask you some questions about the deposition you gave on January 11th, 1994, okay?
A. Uh-huh.
Q. Before you attended that deposition, you had been asked to bring the contract you had with Hard Copy with you to the deposition, right?
MR. ZONEN: I'm going to object as irrelevant.
MR. MESEREAU: Your Honor, I believe the prosecutor introduced the subject of Hard Copy.
MR. ZONEN: Not a contract.
THE COURT: The objection's overruled.
You may answer.
Q. BY MR. MESEREAU: Do you remember that? Let me rephrase it.
A. Okay.
Q. Before you appeared at a sworn deposition on January 11th, 1994, you had been asked to bring a copy of the contract you had with Hard Copy to the 5108

1 deposition, right?
2 A. I don't remember.
3 Q. Do you remember at that deposition, you said
4 you had destroyed the contract?
5 A. I don't remember what I said or --
6 Q. Do you remember saying you'd gotten rid of
7 it?
8 A. I don't remember.
9 Q. Would it refresh your recollection if I just
10 show you the transcript?
11 A. Yeah.
12 MR. MESEREAU: May I approach, Your Honor?
13 THE COURT: Yes.
14 Q. BY MR. MESEREAU: Miss Francia, have you had
15 a chance to review those deposition pages?
16 A. Did I have a -- had I had a chance? No.
17 Q. I'm sorry, no. I just showed you some pages
18 from the deposition, right?
19 A. Yes.
20 Q. Did you have a chance to review that portion
21 of the page that I showed you?
22 A. I haven't read any of the deposition paper.
23 Q. Okay. Did you just read it when I showed it
24 to you?
25 A. Yes.
26 Q. And does it remind you that you said you had
27 gotten rid of the contract?
28 A. Yeah, I probably did. 5109

Q. Okay. Do you remember saying that in the deposition?
A. No, I don't.
Q. Okay. Did you get rid of that contract at some point?
A. Yeah, I don't have it anymore. Yeah, I don't have it.
Q. Did you throw it out?
A. I think I -- yeah, I think I threw it away, or --
Q. Did you throw it out before the deposition of January 1994?
A. Yeah, I think I destroy -- I destroyed it.
Q. Okay. Do you remember stating in that deposition that you showed the contract to Larry Feldman?
A. No.
Q. Do you remember showing that contract to Attorney Larry Feldman?
A. No, I don't remember.
Q. Would it refresh your recollection if I show you the deposition page?
A. Yeah.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
Q. BY MR. MESEREAU: Miss Francia, have you had a chance to look at that page of your deposition?
A. No. 5110

Q. Okay. I just showed you a page of your deposition --
A. Oh, just now, yeah.
Q. Did you have a chance to read that page?
A. Yes.
Q. Does it refresh your recollection about your saying you let Larry Feldman see the contract?
A. I don’t remember.
Q. Okay. You don’t remember showing it to Larry Feldman?
A. No.
Q. Okay. And you met with Larry Feldman, what, twice?
A. Well, first it was here in Santa Maria. He came down.
Q. Okay.
A. And then I met with him when I went there twice.
Q. So is that three meetings you had with Attorney Larry Feldman?
A. Yes.
Q. And that would be in the early 1990s, right?
A. Yes.
Q. Okay. Did you go to him to get some advice?
A. No.
Q. Did you talk to him about what you were going to say on television?
A. No. 5111

Q. You've talked to Santa Barbara Sheriff Russ Birchim a number of times, haven't you?
A. Russ Bir -- it was from Santa Barbara, but I don't remember the name.
Q. Do you know a Santa Barbara sheriff named Russ Birchim?
A. Russ --
Q. Do you know a Santa Barbara sheriff named Russ Birchim?
A. I don't remember the name of it, but it was a detective or sheriff.
Q. Do you remember when your son Jason first spoke to any police officer about what he claims happened with Michael Jackson?
A. I remember one of the times, but I don't know which time it was.
Q. At your deposition, you said that you went on Hard Copy after your son spoke to the police, right?
A. I don't remember if it was before or after.
Q. Okay. Would it refresh your recollection to just show you --
A. Uh-huh.
Q. -- the deposition?
May I approach, Your Honor?
THE COURT: Yes.
Q. BY MR. MESEREAU: Have you had a chance to look at that page from your sworn deposition? 5112

A. Yes.
Q. Does it remind you that your son had talked to the police before you went on Hard Copy?
A. It doesn't -- I don't remember.
Q. Okay. Did you know your son was going to speak to any police officer about Mr. Jackson?
A. No.
Q. It happened without you knowing about it?
A. I didn't know he was -- they were going to talk to him.
Q. Do you have any idea why the police wanted to talk to your son at that point in time?
A. No, I don't remember. I think when they first talked to him, they came to the house and asked me if they could talk to him, but I don't remember when was this.
Q. Do you know who told the police anything about your son?
A. I think they -- someone told me that they needed to talk to my son, or they need to talk to me about my son.
Q. Do you know if Larry Feldman, the attorney, contacted the police about your son?
A. No, I don't know.
Q. Now, you worked approximately five years at the Havenhurst address, right?
A. Altogether --
MR. ZONEN: Misstatement of evidence; 5113

objection.
THE WITNESS: Altogether --
THE COURT: Just a moment.
I sustain the objection, Counsel.
MR. MESEREAU: Okay.
Q. You worked for approximately two years at Neverland, right?
A. Yeah.
MR. ZONEN: Objection; misstatement of evidence.
THE COURT: Overruled.
Q. BY MR. MESEREAU: Is that true?
THE COURT: She answered “Yes” before.
THE WITNESS: Yes.
MR. MESEREAU: Oh, I didn’t hear her. Thank you.
Q. Now, while you were at Neverland, you reported to someone named Norma Stakos, right?
A. Yes.
Q. And who was Norma Stakos?
A. One of the secretaries. She was a secretary.
Q. A secretary to who?
A. Mr. Jackson.
Q. Okay. And you would speak to her from time to time, correct?
A. Yeah.
Q. And do you remember she talked to you in 5114

1991 about the fact that for the third time your wages had been garnished by a creditor?
MR. ZONEN: Objection; irrelevant.
THE COURT: Sustained.
MR. ZONEN: And hearsay.
Q. BY MR. MESEREAU: Did you ask Miss Stakos on behalf of Mr. Jackson to help you with any bills you couldn't pay?
A. No.
MR. ZONEN: Objection; irrelevant.
THE COURT: Overruled. The answer was, "No."
Q. BY MR. MESEREAU: Did you have a discussion with Miss Stakos about the fact that she couldn't pay you?
A. No, never did.
Q. You don't know anything about a wage garnishment?
A. Yes.
Q. What do you know about that?
A. That --
MR. ZONEN: I'm going to object as irrelevant.
MR. MESEREAU: I don't think so, Your Honor.
THE COURT: I thought it was initially, but I changed my mind. So I'll overrule the objection.
Q. BY MR. MESEREAU: What do you remember telling Miss Stakos about a wage garnishment?
A. About my taxes, not paying in time, and I 5115

need -- you know, they needed to wage - how do you call that? - take money out of my paycheck.
Q. Did Miss Stakos help you with that?
A. Well, she was the payroll, so she's the one who took it off of my paycheck. But she never gave me money, or anybody gave me money to pay that.
Q. Do you remember you owed money to a store called Dearden's?
A. Yes.
Q. Okay. And they were trying to garnish your wages, right?
A. Uh-huh. Yeah.
Q. And did you -- you asked Miss Stakos to help you straighten that out, right?
A. Not to straighten it, but to -- you know, just to pay off of my check.
Q. Okay. And did she work with you on that?
A. Yes.
Q. Okay. And she did that for you on a couple of other occasions, right?
A. I remember two times. And I don't remember more than that.
Q. Okay. And she had a problem at one point because you had a phony Social Security number, right?
A. Yes.
Q. Okay. And she helped you straighten that out, right? 5116

A. No.
Q. You eventually got a proper Social Security number?
A. Yes. Yes.
Q. But you did discuss that with Miss Stakos, right?
A. I don’t remember. But they knew that I was illegal, and Mr. Bray wanted to help me to get my papers.
Q. Okay. And that got straightened out, didn’t it?
A. Yeah.
Q. Okay. Did you know someone named Gayle Goforth?
A. Yeah.
Q. And who was Gayle Goforth?
A. The housekeeper. One of the housekeepers. The head housekeeper of the house.
Q. And did you work with her?
A. Yes.
Q. For how long did you work with her?
A. Probably a year, a year and a half. Maybe a year.
Q. And at one point you admitted going into her purse, right?
A. Uh-huh.
Q. And you went into her purse to see how much she was being paid, right? 5117

A. Her purse was on top of the -- our desk, and she have her check on top of it.
Q. And you admitted going into her purse, right?
A. Yes.
Q. The purpose was to see what she was being paid, wasn't it?
A. Yes.
Q. Okay.
A. I admitted to Mr. Jackson.
Q. Excuse me?
A. I told Mr. Jackson about it.
Q. Yes. And he -- he didn't get you in any trouble or anything, did he?
A. No.
Q. Okay. Now, you got a coffee table from Mr. Jackson, didn't you?
A. Yes.
Q. And that was a beautiful oak table, right?
A. (Nods head up and down.)
Q. And where did that come from?
A. From Havenhurst.
Q. Okay. Did you ask for that?
A. Yes.
Q. And he said you could have it, didn't he?
A. Yeah.
Q. Did you ask him for the watch that you described before? 5118

A. No.
Q. How did you end up with the watch?
A. I think it was one of the boxes that he get -- he get stuff from the companies, and I got it from there.
Q. Okay. And at some point did you tell Mr. Jackson you had taken a watch?
A. No, he saw it on me. I show it to him.
Q. And he had no problem with that, right?
A. Yeah.
Q. And you indicated that he used to let you take lots of things from time to time, right?
A. Yeah.
Q. And a lot of those things, I think you described as samples; is that correct?
A. Samples, and gifts, and things that he get from -- for himself.
Q. The oak coffee table had a signature on it, didn't it?
A. A signature? Of him?
Q. Yes.
A. No.
Q. Didn't it have a signature of him?
A. No.
Q. You tried to sell that at one point, right?
A. No.
Q. Still have it?
A. Yeah, it's in the garage somewhere. 5119

Q. Okay. When you left Neverland, who did you report to to tell them that you were leaving?
A. Who did I report?
Q. Yes.
A. I mean, I quit. I just --
Q. Yeah. When you quit, who did you go to and say, “I quit”?
A. I told that lady who was working there at that time. Gayle.
Q. And did you give her one day’s notice?
A. No.
Q. How much notice did you give?
A. No notice.
Q. Okay. You just left, right?
A. I just left.
Q. Okay. Now, on a couple of occasions you got in trouble for not doing your time card properly, correct?
A. A lot of occasions.
Q. Huh?
A. A lot of occasions for being late.
Q. Yes, you got in trouble for being late, right?
A. Yeah.
Q. And you got in trouble for not properly doing your time card, right?
A. Yeah.
Q. Okay. But Mr. Jackson never yelled at you 5120

or did anything mean to you, did he?
A. No. No.
Q. But you didn't get along with some of the help, right?
A. Yeah.
Q. You didn't get along with Gayle Goforth, right?
A. Yeah.
Q. She's the one whose purse you went into, right?
A. Yes.
Q. You and she just didn't get along, right?
A. In the beginning we got along very nice.
Q. Do you remember complaints that you wouldn't let anybody get near Mr. Jackson?
A. That I would get --
Q. Do you remember --
MR. ZONEN: I'll object as hearsay --
THE WITNESS: That I would get --
MR. ZONEN: -- and vague.
THE COURT: Just a moment.
The objection's overruled.
Do you want the question read back? Do you want me to repeat the question for you?
THE WITNESS: Yes, please.
THE COURT: I'll have the court reporter do it.
(Record read.) 5121

THE WITNESS: No.
Q. BY MR. MESEREAU: Never heard of that?
A. Complaints that I wouldn't let anybody?
Q. Yes.
A. No.
Q. On the staff at Neverland?
A. Probably that I was the one allowed in his room, that I was -- I just wanted to do that --
Q. Okay.
A. -- myself.
Q. So you basically wouldn't let other people on the staff get near his room?
A. Yeah.
MR. ZONEN: Objection; misstatement of evidence.
THE COURT: Overruled. The answer was, "Yeah."
THE WITNESS: Because he told me that. He told me not to let anyone in his room.
Q. BY MR. MESEREAU: Okay. Now, the prosecutor asked you about the nickname "Rubba," okay?
A. Yes.
Q. "Rubba" is short for "Rubber Head," right?
A. I don't know.
Q. You never heard that?
A. I don't know.
Q. Okay.
A. I never hear that before. 5122

Q. And Mr. Jackson used to call his cousins,
Levon and Elijah, “Rubba,” right?
A. He call the kids “Rubba,” yeah.
Q. He also called kids “Rubber Head,” or
“Rubba,” right?
A. Yeah.
Q. He’d also use “Apple Head,” right?
A. I don’t know.
Q. He’d use “Doo-Doo Head,” right?
A. Yeah. I think I hear that one time.
Q. Okay. But it’s certainly a term that he
used quite often, isn’t it?
A. “Rubba,” yeah.
Q. He used it on lots -- he used it for lots of
children, including his own cousins, didn’t he?
A. Yeah.
Q. Okay. When is the last time you talked to
Larry Feldman?
A. After the -- I mean, the last time I went
over there and testified, or for the subpoena.
Q. So that was quite a while ago?
A. Yeah.
Q. Okay. Okay. Now, the prosecutor asked you
questions about what you said in the deposition
about what you could see in the shower, right?
A. Yeah.
Q. And in the deposition you said under oath
that all you could see was a shadow, right? 5123

A. Yeah.
Q. Was that the truth?
A. A shadow, an image, yeah.
Q. That's all you could see --
A. Yeah.
Q. -- in the shower, correct?
A. I hear two voices.
Q. You heard giggling and laughing, right?
A. Yeah.
Q. And all you could see was a shadow through the glass?
A. The glass, yes.
Q. And that's because the glass was fogged up, right?
A. Yeah.
Q. Okay. You only saw one person in the shower, right?
A. I saw him in the shower and the little kid.
Q. But in your deposition you said you could only see one person, but you heard giggling, right?
A. Yeah, but I hear two people --
Q. You heard two people. You could only see one through the glass, right?
A. Mostly, yeah. Mostly.
Q. Do you remember you were asked in your deposition, "Did you hear anything else other than Michael laughing?" And you said, "No"?
A. Yeah. 5124

Q. Was that the truth?
A. Yes.
Q. Do you remember in the deposition saying you never saw anyone else in the shower but Mr. Jackson?
A. I don't think I say that.
Q. Would it refresh your recollection if I show you the transcript?
A. Okay.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
MR. ZONEN: Page?
MR. MESEREAU: 401.
Q. Have you had a chance to look at that page of the deposition?
A. Yes.
Q. Does it refresh your memory about what you said about the shower?
A. Yeah.
Q. You saw one person, Mr. Jackson, right?
A. Yes.
Q. Or it looked like him through the glass, right?
A. Yes.
Q. And the only voice you really heard was Mr. Jackson, correct?
A. No.
Q. That wasn't correct?
A. I hear two -- two. 5125

Q. You heard laughter?
A. Laughing and --
Q. And that was at Neverland, right?
A. Yes.
Q. Okay. You've seen Mr. Jackson in his Jacuzzi, correct?
A. Correct.
Q. You've seen him playing in his Jacuzzi, correct?
A. Yeah.
Q. You've never seen him molesting anyone in his Jacuzzi, right?
A. No.
Q. Let me just make sure that's phrased properly. You've never seen Mr. Jackson improperly touch anyone in his Jacuzzi?
A. No.
Q. Never saw that, right?
A. No.
Q. Okay. Have you seen Mr. Jackson at Neverland tickling and playing with children?
A. Yes.
Q. You've seen him do that often, haven't you?
A. Playing, yeah. Playing a lot with the kids.
MR. ZONEN: I'll object to the compound nature of the question, "tickling and playing."
THE COURT: Sustained.
Q. BY MR. MESEREAU: You've seen Mr. -- 5126

MR. ZONEN: Move --
MR. MESEREAU: Oh.
MR. ZONEN: Move to strike the answer.
THE COURT: I think she clarified it in her answer.
MR. ZONEN: Okay. That's fine.
THE COURT: Go ahead, Counsel.
Q. BY MR. MESEREAU: You've seen Mr. Jackson tickling children at Neverland, haven't you?
A. Not that I remember, no.
Q. You never saw him playing in the yard?
A. Playing in the yard, yeah. Not tickling --
MR. ZONEN: Objection to the use of "playing" and "tickling" interchangeably as compound.
THE COURT: Sustained.
MR. MESEREAU: All right. I'll move on.
Q. You've seen children at Neverland from an organization called Make-A-Wish Foundation, correct?
A. Yes.
Q. And children from Make-A-Wish Foundation often used to visit Neverland, right?
A. Yes.
Q. And they would crowd and climb all over Michael Jackson, right?
A. Play with him, yeah.
Q. Well, they would all just surround him, wouldn't they? 5127

A. Yes.
Q. And you would see him play with them often, didn't you?
A. Yes.
Q. You would see those children running around Neverland a lot, correct?
A. Yes.
Q. And Mr. Jackson used to run around with them, didn't he?
A. Yes.
Q. He used to take them to the theater to watch movies, didn't he?
A. Yes.
Q. And children would sometimes sit in his lap in the theater watching the movies, didn't they?
A. I --
Q. Did you ever see that?
A. I never see that. Because I --
Q. I'm sorry.
A. I was never there when he was there with kids.
Q. Okay. Okay. Now, have you participated in any event -- excuse me, during the time you worked at Neverland, did you participate in any large events when guests would come to Neverland?
A. In any events, like --
Q. Guests, parties, things of that sort?
A. Yeah, we used to have an employee barbecue 5128

1 or -- then we all would come.
2 Q. Do you remember any other big events at
3 Neverland while you worked there?
4 A. No.
5 Q. Do you remember helping set up for guests
6 who would visit?
7 A. Yes.
8 Q. That would happen a lot, wouldn't it?
9 A. Yes.
10 Q. And when guests were going to visit
11 Neverland, what would you do?
12 A. What do you mean?
13 Q. Yeah. What were your responsibilities when
14 guests would visit Neverland? What kind of work
15 would you do?
16 A. Help in the house, help the cooks, help to
17 clean their bedrooms.
18 Q. Would you clean bedrooms other than Mr.
19 Jackson's?
20 A. Yeah, the guest rooms.
21 Q. And you used to see guests stay in the guest
22 quarters from time to time, right?
23 A. Yes.
24 Q. Would you see Mr. Jackson's children in the
25 main house when you worked there?
26 A. If I see who?
27 Q. Did you ever see any children --
28 A. Oh. 5129

Q. -- staying in the guest main house when you were there?
MR. ZONEN: Objection. “Guest main house”?
MR. MESEREAU: That didn’t come out too well. I withdraw that.
Q. When you worked at Neverland, did you see any children who used to stay there, besides what you’ve described?
MR. ZONEN: Stay where? Objection; vague.
MR. MESEREAU: Neverland.
THE WITNESS: Stay where, at the guest rooms?
Q. BY MR. MESEREAU: Yes.
A. No. They will stay in the house, in the main house.
Q. Children usually stayed in the main house, right?
A. Yeah.
Q. And do you know someone named Frank Cascio?
A. Frank Cascio. No, I don’t remember.
Q. Do you know a family named “Cascio”?
A. No. I don’t remember.
Q. Do you know someone named Tyson?
A. No.
MR. MESEREAU: Okay. No further questions at this time.

BY MR. ZONEN:
Q. Miss Francia, you told us that Mr. Jackson had mentioned to you about not letting people in his room. What exactly was it that Mr. Jackson told you in that regard?
A. Not to let people in; that people want to know about his business all the time, and not to let anybody get in there.
Q. Did he tell you people in particular?
A. No. Just everybody. Anybody.
Q. Was that something he said to you often?
A. Yeah.
Q. Did you have a key to that room?
A. Yes.
Q. Did he tell you he wanted the room kept locked?
A. Yeah.
Q. During the time that you worked for him at Neverland, did you see people coming and going into his room?
A. No.
Q. During the time that you worked at Neverland, did that door stay locked fairly regularly?
A. Closed all the time.
Q. Were there ever people coming and going into his room that he did not give permission to come and go into the room? 5131

A. No.
Q. Did Wade Robeson come and go into his room at will?
A. Yeah. Kids were allowed to go there.
Q. Other kids were allowed to come into his room?
A. Yeah.
Q. If he was there -- if he was not there, or only when he was there?
A. Kids were there when he was there.
Q. If he wasn't there, they didn't stay in his room?
A. They -- they never came when he wasn't there.
Q. On those occasions that he was traveling, the "Bad" tour -- Mr. Mesereau was asking you about his travels during the "Bad" tour.
A. Uh-huh.
Q. And he mentioned a period of time that exceeded a year and a half that he was on tour. Was he continuously away from California for a full year and a half, or would he come and go?
A. He'd come and go.
Q. There were times that he would return?
A. Yeah.
Q. And stay?
A. Yeah.
Q. Do you know the longest period of time that 5132

he would be away from his residence during that time?
A. Probably about three months.
Q. Three months? Was the residence both the Encino home and the hideout in L.A.?
A. It was mostly the hideout.
Q. Did that tour extend to the period of time after which he moved to Neverland Ranch, or was he completed with his tour by then; do you recall?
A. I don't remember.
Q. You told Mr. Mesereau that you had answered a question in the deposition about seeing a shadow in the shower. What did you mean by that? What is a shadow? Tell me, what is a shadow?
A. An image.
Q. An image. All right. What did you see when you looked into that shower?
A. Mr. Jackson.
Q. All right. Did you see the shadow of Mr. Jackson, or did you see a person that looked like a shadow?
A. Through the glass.
Q. What did you see through the glass?
A. Mr. Jackson.
Q. The actual person?
A. Yeah.
Q. Okay. You didn't see his shadow cast against a wall, or against the floor? 5133

A. Huh-uh. No.
Q. All right. So what did you mean by the word
“shadow”?
A. His image.
Q. His image. That’s what he looked like?
A. Yeah.
Q. All right. And was the door blurred during
that time?
A. Yeah.
MR. ZONEN: Excuse me. These are all next
in order, please.
Q. At the time that you looked through the
glass into the shower, were you able to see a second
person in there?
A. I want to say yeah, but I don’t -- you know,
I hear the laughing and the talking and, you know,
playing, and I -- I didn’t see the actual person,
but it was moving, you know, with him.
Q. Do you believe that you saw the image of a
second person?
A. Yeah.
Q. But not as clearly as Mr. Jackson?
A. Not as clearly, no.
Q. Did you hear one voice or two?
A. Two.
Q. And were you clear about that?
A. Yes.
Q. And did you tell that to Mr. Feldman in the 5134

deposition?
A. Oh.
Q. I'm sorry?
A. I don't remember.
Q. You don't remember what you said?
A. No.
Q. The deposition was how many years ago?
A. More than ten years, I think.
Q. Okay. The portion that Mr. Mesereau asked you, when he showed you that transcript about one or two people, do you recall when in the deposition that question was asked of you? Was it the first day or the second day of the deposition?
A. I don't know.
Q. Was it toward the end of the deposition?
A. I don't know. I think so. I don't remember.
Q. Before the deposition began, did they ask you if you wanted to testify in either English or Spanish?
A. I don't think so.
Q. Did they simply assume that you would testify in English?
A. Yeah.
Q. All right. This was 11 years ago?
A. Yes.
Q. Is your English as good as it is now?
A. A little better, I think. 5135

Q. A little better now?
A. Yeah.
Q. Would you have preferred to have testified in Spanish at that time?
MR. MESEREAU: Objection. Relevance; calls for speculation.
THE COURT: Sustained.
Q. BY MR. ZONEN: Were you comfortable in English at this time?
A. I wish it would have been in Spanish.
Q. Did you understand all of the questions that were asked of you during that deposition?
A. I was very confused.
Q. Were you confused as to some of the questions?
A. Yeah, and all the lawyers and --
Q. There were a lot of lawyers there, weren't there?
A. Yeah.
MR. MESEREAU: Objection. Leading; move to strike.
THE COURT: Overruled. Next question.
Q. BY MR. ZONEN: Were you intimidated during that deposition?
MR. MESEREAU: Objection; leading.
THE COURT: Sustained.
Q. BY MR. ZONEN: How did you feel during that deposition? 5136

MR. MESEREAU: Objection --
THE WITNESS: I was uncomfortable.
MR. MESEREAU: -- knowledge; foundation.
THE COURT: Overruled. She said,
"Uncomfortable."
Q. BY MR. ZONEN: You remembered the monkey
Bubbles -- excuse me, the chimp, the chimpanzee; is
that right?
A. Bubbles, yes.
Q. Was Bubbles at more than one location?
A. I don't remember that. I think I remember
that other little monkey. I think it was a
different one. But I remember Bubbles at
Havenhurst. And then he was taken to some kind of
farm or trainer.
Q. Did Bubbles get a little too big?
A. Yeah.
Q. Did Bubbles get rambunctious, wild?
A. Wild.
Q. Did Bubbles ever bite you?
A. Yeah.
Q. On more than one occasion?
A. Twice.
Q. Twice?
At some time did you become a legal
resident?
A. Yes.
Q. And you had told them at Neverland about 5137

your status?
A. Yeah.
Q. Is that correct?
A. It was at that time. At that time that I --
Q. While you were working at Neverland; is that correct?
A. Yeah.
Q. You mentioned about the coffee table. Where was the coffee table at the time that Mr. Jackson gave it to you?
A. Havenhurst.
Q. It was at Havenhurst. And where at Havenhurst?
A. It was at his dance floor.
Q. Uh-huh.
A. And on top, in the attic.
Q. In the attic?
A. Yeah.
Q. Was it being used as a coffee table or was it being stored?
A. No, it was being used. It just -- I guess the room was too small, and, you know, it was just in the way for everybody to -- I mean, for -- I guess for people to be there, and --
Q. How did the coffee table end up going to you?
A. Because he wanted it to move out. He wanted it to be moved out, out of there. 5138

Q. He was getting rid of it?
A. Yes.
Q. And you knew that?
A. Well, he said, “Move it out of here,” and I asked him if I can take it.
Q. And what did he say?
A. And he said, “Yeah, take it.”
Q. Mr. Mesereau asked you questions about your interview with Hard Copy.
A. Yes.
Q. All right. Were you interviewed by more than one person with Hard Copy?
A. No.
Q. Was that one person Diane Dimond?
A. Yes.
Q. Did you have more than one conversation with her?
A. Do you mean personally?
Q. Yes.
A. Yes, just one.
Q. Was there a conversation, like an interview, and then the interview on television?
A. No, that -- the same day we did everything. She came to the lobby of the hotel, and then we went upstairs and did it.
Q. She came to the lobby. So it was all on the same day?
A. Uh-huh. 5139

Q. Was the interview done at the hotel?
A. Yeah.
Q. Were there a number of questions that were asked of you during that interview?
A. There were many questions asking about who? Me?
Q. Were there a lot of questions that they asked?
A. Oh. Yeah.
Q. I say “they,” but actually, was it just Diane Dimond who asked you questions?
A. Yes.
Q. Yes?
A. Yes.
Q. Was anyone else asking you questions?
A. No, I don’t remember. I don’t think so.
Q. Did you know in advance what the questions were going to be?
A. No.
Q. Were you surprised by what the questions were?
A. Yeah. Yes.
Q. Did you know it was going to be about Michael Jackson?
A. No. I thought it was going to be about me working there.
Q. All right. That was the part that surprised you? 5140

A. Yeah.
Q. Were you upset about it?
A. Yeah, because then I start to answer, and I felt like I was just there, you know, answering questions that I didn't know they were going to ask me.
Q. Okay. Did it upset you?
A. Yeah.
Q. Did you tell them you were upset about that?
A. No.
Q. Were you truthful in your answers?
A. Yeah.
Q. Mr. Mesereau asked you if it was true that you told Diane Dimond in this interview that you never saw Michael Jackson molest a child; is that correct?
A. Yeah.
Q. What else did you tell Diane Dimond in the interview?
A. I don't remember.
Q. Did you tell Diane Dimond about seeing him sleeping with boys?
A. Yeah.
Q. Did you tell her that that concerned you?
MR. MESEREAU: Objection. These are leading questions.
THE COURT: Sustained.
Q. BY MR. ZONEN: Was there any conversation 5141

with Diane Dimond regarding any of the boys that you testified to so far today?
A. I'm sorry, repeat?
Q. Was there any conversation with Diane Dimond regarding the testimony you've given today about any of those boys? You testified about Wade Robeson. You testified about Macaulay Culkin. Did you discuss either of those boys with Diane Dimond?
A. No, I said -- I think the only -- that I say that I see him is sleeping with the kids and being in the bathtub with them, playing.
Q. And you told Diane Dimond that?
A. Yeah, I think I did.
Q. Now, this is the bathtub or this is the shower?
A. I don't remember if I told her about the shower. But I remember that I told him about the bathtub and the Jacuzzi, I think.
Q. I'm sorry?
A. I told her about the Jacuzzi and the bathtub, I think.
Q. And being there with boys?
A. Being with boys. Yeah, that I will clean up their -- you know, their toys in the bathtub.
Q. Mr. Mesereau asked you on cross-examination if you ever saw Michael Jackson in the Jacuzzi at the Havenhurst residence; is that correct?
A. Excuse me? Mr. -- 5142

Q. Mr. Mesereau asked you if you saw Mr.
Jackson in the Jacuzzi at the Havenhurst residence.
A. Uh-huh. Yeah.
Q. And you said, “Yes”?
A. Yeah.
Q. With a boy; is that true?
A. It wasn’t -- yeah.
Q. Mr. Mesereau asked you if you had seen
Michael Jackson in bed with Wade Robeson twice, and
you said, “Yes”?
A. Yeah.
Q. Did you actually see Wade Robeson in bed
with Michael Jackson?
A. Yeah. Yes.
Q. And that was on two different occasions?
A. Yes.
Q. That doesn’t include the times that you
didn’t see them in bed, but you cleaned up after
them?
A. Yeah.
Q. When were the two times that you actually
saw him in bed with Wade Robeson?
A. When was the two times? Do you mean the
dates?
Q. Well, I doubt you could do that, but --
could you do that? Do you know the dates?
A. No. No.
Q. Can you give me -- do you remember the two 5143

occasions when you saw them? Do you remember either of the two occasions?
A. Just simply be in bed with him.
Q. How did that happen, that you were there and they were in bed together? How did it happen that you saw them?
A. Watching T.V.
Q. They were watching T.V. Were they inside the bed or on top of the bed?
A. Inside the bed.
Q. Do you remember what they were wearing?
A. No.
Q. Do you remember if they were wearing anything?
MR. MESEREAU: Objection; no foundation.
THE WITNESS: No.
THE COURT: Just a moment.
Sustained.
Q. BY MR. ZONEN: Could you see any clothing on either one of them?
MR. MESEREAU: Objection; foundation.
THE COURT: Overruled.
You may answer.
Q. BY MR. ZONEN: Could you see any clothing on either one of them?
A. I saw from the waist up, so -- I don't know if they had pajamas or --
Q. But from the waist up, were either one of 5144

1 them wearing anything?
2 A. No.
3 Q. They were both nude from the waist up?
4 A. Yeah.
5 Q. On both occasions?
6 A. On one occasion I remember.
7 Q. On one occasion?
8 A. On one occasion.
9 MR. ZONEN: May I have those photographs,
10 Counsel? Oh, thank you.
11 Q. I'd like to show you a series of
12 photographs, if I may. These photographs are
13 numbered consecutively 783 through 789.
14 May I approach the witness, Your Honor?
15 THE COURT: Yes.
16 Q. BY MR. ZONEN: Let me begin with Photograph
17 No. 783. Could you take a look at that photograph?
18 A. Uh-huh.
19 Q. Do you recognize the content of that
20 photograph?
21 A. Yeah.
22 Q. And what is that of?
23 A. This is Mr. Jackson.
24 Q. Oh, you need to use the microphone. I don't
25 think anybody can hear you.
26 783, then, is what, please?
27 A. Mr. Jackson's bed.
28 Q. That's his bedroom? 5145

A. His bedroom, yeah.
Q. Is that upstairs or downstairs?
A. Downstairs.
Q. Does this show the bed?
A. Yes.
Q. 784, please, what is that?
A. That's his bedroom.
Q. Upstairs or downstairs?
A. Downstairs.
Q. 785, what is that, please?
A. His bedroom.
Q. Upstairs or downstairs?
A. Downstairs.
Q. 786, what is that?
A. That's the Jacuzzi.
Q. I'm sorry?
A. The Jacuzzi.
Q. First floor?
A. In the bathroom.
Q. Okay. And can you see where the shower is in that photograph?
A. I can just see the -- right here, the frame, the door frame.
Q. If I were to give you a pen and ask you to draw an arrow to where the shower goes, would you do that?
A. Yeah. I mean, the --
Q. Yes, go ahead. 5146

Okay. And for the record, an arrow has been drawn to the far right side of this exhibit, No. 786.
No. 777, can you tell me what that is?
A. That's the bathroom.
Q. The shower?
A. The shower.
Q. On the first floor?
A. Yes.
Q. No. 788, what is that, please?
A. That's the shower, that's the security -- I mean, the bedroom -- I mean, the closet.
Q. And that's the garden?
A. And that's the Jacuzzi.
Q. Okay. Now, we were looking at a few different things that you -- we're going to go through this when we present it.
But in this photograph, which is No. 788, can you see both the Jacuzzi and the room that has the shower in it?
A. Yes. Right across from each other.
Q. Okay. And then finally, 789, if you'd look at that, please.
A. Yeah, this is the room upstairs.
Q. That's the bedroom upstairs?
A. The bedroom upstairs, yes.
Q. And that has a bed as well?
A. Yeah. 5147

Q. The photographs that I've just asked you to look at, which are No. 783 through 789, do each of these photographs accurately depict the subject matter contained in the photograph, which means are they accurate? Are the photographs accurate of those rooms and those locations?
A. Yes.
Q. Okay. Now, are these accurate as of 1993?
A. Do you mean --
Q. As of the time that you were there, last there, is it how it looked around the time when you were there?
A. No.
Q. Okay. Tell me what's different.
A. Well, the T.V. -- like, the bed is the same thing. And the television is the same. It's just more stuff in it.
Q. Just more stuff in it?
A. Yeah.
Q. Okay. And the one that you're looking at, as you say that, is 783.
All right. And 784, does that appear the same as you last saw it?
A. No.
Q. What's different?
A. There's more stuff in it.
Q. More stuff?
A. Yeah. 5148

Q. But the furniture is in the same place?
A. Yes.
Q. 785?
A. Yeah. This wasn't here when I was there.
Q. I'm sorry?
A. It wasn't -- it wasn't like when I used to clean it.
Q. How was it different?
A. The paintings and this mannequin.
Q. All right. I'm going to withdraw this one. I'm going to withdraw 785.
786. Take a look at 786.
A. Yeah, that's the same. I mean, that's the same, the same as far as the furniture, and even the towels and --
Q. Okay.
A. -- the toys.
Q. 787?
A. It's the same.
Q. Okay.
A. It's just crowded.
Q. 788?
A. Yeah, it's the same.
Q. And seven -- let me see that again. All right. This was 789 that I showed you and originally called it 787.
Back to 789. So this is the same?
A. Yes. 5149

Q. All right. Here is the real 787, with the shower. Is that the same?
A. Yes.
Q. Okay. And then 787 is the same?
A. Yes.
MR. ZONEN: Okay. Your Honor, I'm going to move into evidence 783, 784, 786, 787 and 788 and 789, and withdraw 785.
MR. MESEREAU: No objection.
THE COURT: They're admitted.
MR. ZONEN: May I publish these at this time?
THE COURT: Yes.
Q. BY MR. ZONEN: Mrs. Francia, this is a laser pen, and it sheds a laser beam. And you just go like that. Don't show it in anybody's eyes. The first one is 783. And would you tell us what that is, please?
A. 783, this?
Q. Yes, that room.
A. Mr. Jackson's bed and --
Q. Oh, we have a problem. Unfortunately, you're going to have to turn back to use the microphone. Take a look at it, and then turn back to use the microphone so we can hear you.
A. That's Mr. Jackson's bed, and television. And that's the entrance, the stair that goes to the stairs, three. And then you go around to the 5150

bathroom.
Q. Okay. 784. And tell us what that is,
please.
A. That's the same. This will be the
television cabinet.
Q. And this is the first floor again; is that
right?
A. Yes.
Q. All right. Now, did you say that there was
some things that weren't there --
A. Yes.
Q. -- at the time that you last worked for Mr.
Jackson.
Show us what that is.
A. These pictures here.
Q. Those pictures right there. Anything else?
A. This horse.
Q. Okay. Now, Mr. Jackson did not have
children of his own at that time, did he?
A. No.
Q. Okay. 786, please.
Now, here's the one where I asked you to put
an arrow. Do you recognize the arrow where you put
it?
A. Yes.
Q. Show it.
A. Right there.
Q. What does that point to? 5151

A. The shower.
Q. And where is the shower?
A. Right here. About right here.
Q. And you had told us earlier in your -- this is the first-floor bathroom; is that right?
A. Yes.
Q. And you told us earlier in your testimony, that you had to come closer to be able to see into that room?
A. Yes.
Q. Can you show us in this picture where you were standing at the time that you actually looked into that room?
A. Probably about right here. So I can see in.
Q. All right. And then you said that there was also a Jacuzzi outside?
A. It's a shower. Right there.
Q. A shower. So is that on the other side of that wall, the back wall?
A. Yes.
Q. All right. Next picture, please. And this, I think, is 787. And what is that?
A. That's the shower.
Q. All right. Is that the same door that you recall?
A. Yes.
Q. All right. And that's the shower that you 5152

1 gave testimony to.
2 And the last one, please. Two more.
3 788. And this is 788. Is that the same
4 bathroom downstairs?
5 A. Yes.
6 Q. All right. Do you have a better view of the
7 room that has the shower?
8 A. Yes.
9 Q. Show us where that is, with the laser.
10 A. Right here.
11 Q. Okay. That's the toilet that you can see?
12 A. Yes.
13 Q. And on the other side of the toilet is the
14 shower?
15 A. Uh-huh. Right next to it.
16 Q. All right. Can you show us now where you
17 were standing? Can you put the laser on where your
18 feet were at the time you were standing?
19 A. Probably right here. Right here on this
20 corner.
21 Q. Okay. And then finally, 789.
22 And what is that, please?
23 A. That's his -- that's another room.
24 Q. That was the bed upstairs?
25 A. Uh-huh. Second floor.
26 Q. Now, Mr. Mesereau asked you about that bed.
27 Sometimes it is slept in and sometimes it is not.
28 A. Yeah. 5153

Q. During that period of time that Wade Robeson was coming and visiting, was that bed slept in a lot?
A. No.
Q. Was it slept in infrequently?
A. No, I always -- just only when a lot of kids were there.
Q. Okay. If it was just Wade Robeson, he didn't sleep in that bed?
A. No.
Q. How about Macaulay Culkin?
A. No.
Q. He didn't either?
A. No.
MR. ZONEN: Thank you.
I have no further questions, Your Honor.
And these exhibits are in evidence. Yes, they are. Thank you. No further questions.

RECROSS-EXAMINATION
BY MR. MESEREAU:
Q. Just very briefly.
When -- during the time you worked at Neverland, Mr. Jackson would often have guests in his room, right?
A. Yes.
Q. And people would often hang out on his bed and watch television, correct? 5154

A. Yes.
Q. You would often serve them food, right?
A. Yes.
Q. And you would serve them drinks, right?
A. Yes.
Q. That went on at all hours of the day,
correct?
A. Yes.
MR. MESEREAU: No further questions.
THE COURT: All right. Thank you.
MR. ZONEN: And I have no further questions,
Your Honor.
THE COURT: All right. You may step down.
And we'll recess for the day. And there's
no court tomorrow. I'll see you Thursday morning.
(The proceedings adjourned at 2:30 p.m.)
--o0o--

REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 4965 through 5155 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on April 5, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, April 5, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304